



FEMA

Cost of Assistance Estimates in the Disaster Declaration Process for the Public Assistance Program

Notice of Proposed Rulemaking

Regulatory Impact Analysis

FEMA-2020-0038

RIN: 1660-AA99

November 2020

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ACRONYMS AND ABBREVIATIONS

BEA	Bureau of Economic Analysis
BLS	Bureau of Labor Statistics
BRIC	Building Resilient Infrastructure and Communities
CFR	Code of Federal Regulations
COA	Cost of Assistance
COI	Collection of Information
CPI-U	Consumer Price Index for All Urban Consumers
DC	District of Columbia
DHS	Department of Homeland Security
DRRA	Disaster Recovery Reform Act of 2018
EDW	Enterprise Data Warehouse
FAC-TRAX	FEMA Applicant Case Tracker
FEMA	Federal Emergency Management Agency
FMA	Flood Mitigation Assistance
FY	Fiscal Year
GAO	Government Accountability Office
GDP	Gross Domestic Product
GS	General Schedule
HMA	Hazard Mitigation Assistance
HMGP	Hazard Mitigation Grant Program
IA	Individual Assistance
NAICS	North American Industry Classification System
NASBO	National Association of State Budget Officers
NEMA	National Emergency Management Association
OES	Occupational Employment Statistics
OIG	Office of Inspector General
OMB	Office of Management and Budget
PA	Public Assistance
PA Disasters	Major Disaster Declaration that Activated the PA Program
PAPPG	PA Program and Policy Guide
PCPI	Per Capita Personal Income
PDA	Preliminary Damage Assessment
PDM	Pre-Disaster Mitigation
PEP	Population Estimates Program
PNP	Private Nonprofit
PRA	Paperwork Reduction Act
RIA	Regulatory Impact Analysis
SANPRM	Supplemental Advance Notice of Proposed Rulemaking
SRIA	Sandy Recovery Improvement Act of 2013
Stafford Act	Robert T. Stafford Disaster Relief and Emergency Assistance Act
Standard Occupational Code	SOC
TAR	Total Actual Revenues
Tribal Governments	Federally Recognized Indian Tribal Governments
TTR	Total Taxable Resources
US	United States

EXECUTIVE SUMMARY

Executive Orders 12866 (Regulatory Planning and Review) and 13563 (Improving Regulation and Regulatory Review) direct agencies to assess the costs and benefits of available regulatory alternatives and, if regulation is necessary, to select regulatory approaches that maximize net benefits (including potential economic, environmental, public health and safety effects, distributive impacts, and equity). Executive Order 13563 emphasizes the importance of quantifying both costs and benefits, of reducing costs, of harmonizing rules, and of promoting flexibility. Executive Order 13771 (Reducing Regulation and Controlling Regulatory Costs) directs agencies to reduce regulation and control regulatory costs and provides that “for every one new regulation issued, at least two prior regulations be identified for elimination, and that the cost of planned regulations be prudently managed and controlled through a budgeting process.”

The Office of Management and Budget (OMB) has designated this rule a “significant regulatory action”, under section 3(f)(1) of Executive Order 12866. Accordingly, this rule has been reviewed by OMB. FEMA conducted this Regulatory Impact Analysis (RIA) to assess the potential costs, benefits, and transfers from this proposed rule, and the proposed rule has been found to be economically significant under EO 12866. This rule is exempt from the requirements of Executive Order 13771 because it has de minimis costs spread across all States and territories. See OMB’s Memorandum “Guidance Implementing Executive Order 13771, Titled ‘Reducing Regulation and Controlling Regulatory Costs’” (April 5, 2017).

This Regulatory Impact Analysis (RIA) provides an assessment of the potential costs, benefits, and transfers from the Cost of Assistance (COA) Estimates in the Disaster Declaration Process for the Public Assistance (PA) Program Notice of Proposed Rulemaking (NPRM). This report does not attempt to replicate the regulatory language of the proposed rule or any other supporting documentation. FEMA urges the reader to review the NPRM before reviewing this report.

FEMA proposes to amend 44 CFR 206.48(a)(1) by revising the “estimated cost of the assistance” factor it considers when recommending a major disaster declaration that authorizes PA. FEMA proposes four associated changes in 44 CFR 206.48 to conform regulations with Section 1239 of the Disaster Recovery Reform Act of 2018 (DRRA). Table ES-1 provides a summary of the impacts of the proposed rule. The four proposed changes are:

(1) Increase the per capita indicator from \$1.50¹ to \$2.32 to account for inflation using Consumer Price Index for All Urban Consumers (CPI-U) data from 1986 to 1999 because no inflation factor was applied during that period.² Adjust the per capita indicator by each individual State’s total taxable resources (TTR).

¹ The per capita indicator of \$1.50 was established for FY 2019 and was the most recent per capita indicator available at the time of this analysis. FEMA, Per Capita Indicator and Project Thresholds available at: <https://www.fema.gov/public-assistance-indicator-and-project-thresholds>.

² Data was used from the Bureau of Labor Statistics Historical Consumer Price Index for All Urban Consumers (CPI-U): U.S. city average, all items, by month. FEMA uses the latest available month of CPI-U data to adjust the

(2) Increase the minimum threshold for major disaster declarations that authorize PA from \$1 million to \$1.535 million to account for inflation since 1999 and to adjust the threshold by CPI-U annually thereafter.³

(3) Use the US Census Bureau's annual population estimates produced under the Population Estimates Program (PEP) when calculating the individual State's COA indicator. FEMA's current practice is to use the decennial census population data when calculating the State COA indicator.

(4) Make minor technical and corresponding grammatical changes to section 206.48 introductory paragraph and paragraph (a).

minimum threshold and per capita indicator each fiscal year, which is generally August CPI-U data. August 2018 CPI-U data was the latest available data when FEMA established the FY2019 per capita indicator and is used in this analysis to maintain consistency with FEMA practice. At the time of drafting this proposed rule, the FY2019 indicator was the most recent established indicator. The per capita indicator of \$1 was established in April 1986. April 1986 CPI-U was 108.6 and August 2018 CPI-U was 252.146. Calculation: $((252.146 - 108.6) / 108.6) + 1 = 2.322$ conversion factor (rounded). $2.322 \times \$1 = \2.32 (rounded).

³ January 1999 CPI-U was 164.3 and August 2018 CPI-U was 252.146. Calculation: $(252.146 - 164.3) / 164.3 + 1 = 1.535$ conversation factor (rounded). $1.535 \times \$1,000,000 = \$1,535,000$.

Table ES-1 Summary of the Impacts of the Proposed Rule (2018\$)

Category	Summary
Proposed Changes	Replace the per capita indicator of \$1.50 with \$2.32 to account for inflation from 1986-1999 and then adjust by State TTR annually
	Replace the minimum threshold of \$1,000,000 with \$1,535,000 and adjust by CPI-U annually
	Use PEP annual population estimates instead of decennial census data to calculate the State COA indicator
	Technical and grammatical changes to 44 CFR 206.48(a)
Affected Population	Applicants eligible to submit an application for a PA project include 56 State and Territorial governments, 573 Federally recognized Indian Tribal governments, local governments, and certain private nonprofit organizations (PNPs). From 2008-2017, 7,456 Applicants would have been impacted by the proposed rule.
Transfers	\$208.76 million annualized and \$1.47 billion and \$1.78 billion 10-year monetized reduction in transfers to the Applicants from FEMA at 7 and 3 percent discount rates, respectively
Cost Savings (due to reduced disaster declaration requests and applications)	\$62.71 million annualized and \$440.45 million and \$534.93 million 10-year monetized FEMA costs savings at 7 and 3 percent discount rates, respectively
	\$8.04 million annualized and \$56.44 million and \$68.55 million 10-year monetized Applicant cost savings at 7 and 3 percent discount rates, respectively
Costs (quantitative)	\$5,274 and \$4,513 annualized; and \$37,042 and \$38,496 10-year monetized costs to Applicants and FEMA at 7 and 3 percent discount rates, respectively
Costs (qualitative)	Applicants would need to invest more in response recovery, and mitigation capabilities.
	Damaged facilities may not be repaired or replaced and could be susceptible to future disasters.
Benefits (quantitative)	No quantitative benefits
Benefits (qualitative)	Provide FEMA with a more accurate assessment of whether an incident has exceeded an Applicant's capabilities to respond to and recover from an incident.
	Incentivize Applicants to invest more in response, recovery, and mitigation capabilities, and increase overall national preparedness for incidents.
	Allow FEMA to refine its focus and resources on large-scale disasters.

Affected Population

The proposed rule would affect all applicants that are eligible to request a Federal major disaster declaration authorizing PA (PA disasters). Eligible applicants for PA include 50 State, 6 Territorial governments, and the District of Columbia, as well as 573 Federally recognized

Indian Tribal governments,⁴ local governments, and certain PNPs. A disaster declaration is done at the State level, but the Applicants fill out the forms for PA eligibility and to receive funding once PA funding is made available through a declaration. For simplicity, FEMA refers to States, Territories, the District of Columbia, and Tribal Declarations as States and the affected population as Applicants throughout the RIA. If this proposed rule was in effect from 2008-2017, 7,456 Applicants for 159 PA disasters would have been impacted by the proposed rule. These Applicants would have had a reduction in grant funding, including funding and management costs for PA, funding and management costs for HMGP, and funding and management costs for BRIC. These Applicants would have also had paperwork cost savings for not filling out the forms to determine eligibility and receive funding.

Reduction in Disaster Declarations

As discussed later in this analysis, FEMA used data for the PA disasters from fiscal years (FY) 2008-2017 to estimate how the proposed rule would impact the number of PA disasters and the funding and costs associated with those PA disasters. FEMA used historical data on the estimated impacts on PA disasters from 2008-2017 as a proxy to estimate the impacts over the next ten years after this rule becomes final and effective. FEMA found there were a total of 585 PA disasters over the 10-year period of analysis, an average of 59 disasters per year. FEMA estimates that there would be 159 PA disasters that would no longer be declared as disasters under the proposed rule, an average of 16 fewer PA disasters per year as further discussed in Section 8.1 of the RIA. This represents a 27 percent reduction in PA disasters declared from 2008-2017 under this proposed rule.

Transfers

Transfer payments are monetary payments from one group to another that do not affect the total resources available to society. Transfers can have significant efficiency effects in addition to distributional effects and are not included in the estimates of the benefits and costs of a regulation. Transfers are analyzed in this RIA because grants, i.e. those grants made by FEMA for PA, are considered transfers.

The reduction in PA disasters would result in a reduction in grant funding to the Applicants, including funding and management costs for PA, funding and management costs for HMGP, and funding and management costs for BRIC. The reduction in funding from these programs equates to a reduction in transfers from FEMA to the Applicants. FEMA estimates the 10-year undiscounted transfers of the proposed rulemaking would be \$2.09 billion. The total 10-year discounted transfers would be \$1.47 billion at a 7 percent discount rate and \$1.78 billion at a 3 percent discount rate, with annualized transfers of \$208.76 million at both 7 and 3 percent discount rates (Table ES-2).

⁴ Only Tribal governments that request PA funding through a State requested major disaster declaration (e.g., as a subrecipient) are affected by the proposed rule. The process for Tribal governments to directly request a disaster declaration, as outlined in the Tribal Declarations Pilot Guidance, is not affected by this proposed rule. FEMA Tribal Declarations Pilot Guidance is available at: <https://www.fema.gov/tribal-declarations-pilot-guidance>. However, for purposes of defining the “Affected Population,” FEMA has listed all 573 Federally recognized Indian Tribal governments because any Tribal government may request PA funding through a State requested major disaster declaration. The impacts to Tribal governments are discussed further in Section 13 of this RIA. A list of the 573 Tribal entities can be found at: <https://www.federalregister.gov/documents/2018/07/23/2018-15679/indian-entities-recognized-and-eligible-to-receive-services-from-the-united-states-bureau-of-indian>.

Table ES-2 Total Estimated Transfers of the Proposed Rule (2018\$)

Year	Total Undiscounted Reduction in Transfers from FEMA to Applicants	Discounted	
		7%	3%
1	\$208,758,700	\$195,101,589	\$202,678,350
2	\$208,758,700	\$182,337,933	\$196,775,097
3	\$208,758,700	\$170,409,284	\$191,043,783
4	\$208,758,700	\$159,261,013	\$185,479,401
5	\$208,758,700	\$148,842,068	\$180,077,088
6	\$208,758,700	\$139,104,736	\$174,832,125
7	\$208,758,700	\$130,004,427	\$169,739,927
8	\$208,758,700	\$121,499,464	\$164,796,046
9	\$208,758,700	\$113,550,901	\$159,996,161
10	\$208,758,700	\$106,122,337	\$155,336,078
<i>Total</i>	\$2,087,587,000	\$1,466,233,752	\$1,780,754,055
<i>Annualized</i>		\$208,758,700	\$208,758,700

Cost Savings

The proposed rulemaking would result in administrative cost savings for FEMA, and paperwork cost savings for the Applicants and FEMA due to a decrease in the number of PA, BRIC, and HMGP applications resulting from fewer disaster declarations. The 10-year undiscounted FEMA cost savings resulting from the proposed rule would be \$627.10 million (\$440.45 million discounted at 7 percent discount rate and \$534.92 million at a 3 percent discount rate; \$62.71 million annualized at both 7 and 3 percent discount rates). FEMA estimates the 10-year undiscounted Applicant cost savings would be \$73.30 million (\$51.48 million at 7 percent and \$62.53 million at 3 percent; \$7.33 million annualized at both 7 and 3 percent). The total 10-year undiscounted cost savings for both FEMA and the Applicants would be \$700.40 million because there would be fewer requests for disasters to be declared and there would be fewer Applicants able to apply for relief. The 10-year total discounted cost savings would be \$491.93 million at 7 percent and \$597.46 million at 3 percent, with an annualized cost savings of \$70.75 million (Table ES-3).

Table ES-3 Total Estimated Cost Savings of the Proposed Rule (2018\$)

Year	Applicant Cost Savings	FEMA Cost Savings	Total Undiscounted Cost Savings	Discounted	
				7%	3%
1	\$8,035,714	\$62,710,053	\$70,745,767	\$66,117,539	\$68,685,211
2	\$8,035,714	\$62,710,053	\$70,745,767	\$61,792,093	\$66,684,671
3	\$8,035,714	\$62,710,053	\$70,745,767	\$57,749,619	\$64,742,399
4	\$8,035,714	\$62,710,053	\$70,745,767	\$53,971,607	\$62,856,698
5	\$8,035,714	\$62,710,053	\$70,745,767	\$50,440,754	\$61,025,920
6	\$8,035,714	\$62,710,053	\$70,745,767	\$47,140,892	\$59,248,466
7	\$8,035,714	\$62,710,053	\$70,745,767	\$44,056,908	\$57,522,783
8	\$8,035,714	\$62,710,053	\$70,745,767	\$41,174,681	\$55,847,362
9	\$8,035,714	\$62,710,053	\$70,745,767	\$38,481,010	\$54,220,740
10	\$8,035,714	\$62,710,053	\$70,745,767	\$35,963,561	\$52,641,495
<i>Total</i>	\$80,357,140	\$627,100,530	\$707,457,670	\$496,888,663	\$603,475,742
<i>Annualized</i>				\$70,745,767	\$70,745,767

Costs

The proposed rule would substantively revise the estimated cost of the assistance disaster declaration factor. The proposed rule would not create new factors for FEMA to consider when reviewing a request for a PA disaster. FEMA would not change its current process for updating the per capita indicator. FEMA's current practice is to update the per capita indicator each fiscal year to adjust for inflation using the CPI-U and post the updated indicator in the Federal Register and FEMA website. The proposed rule would also require FEMA to update the minimum threshold every year to adjust for inflation. This is a new practice, as the threshold has not been updated since it was introduced in 1999. However, FEMA already calculates the change in CPI-U to apply to the per capita indicator each year. FEMA would apply the same change in CPI-U used to update the per capita indicator to the minimum threshold. The proposed rule would require FEMA to adjust the per capita indicator for each State's TTR, which is a new practice that FEMA is implementing to more accurately gauge a State's fiscal capacity to respond to disasters. FEMA estimates it would cost \$12 per year for a FEMA employee to adjust the per capita indicator by TTR annually.

FEMA would continue to post the updated per capita indicator each fiscal year and would not require any additional annual calculations or data requirements from the Applicants. The proposed rule would impose a onetime cost of \$2,472 to the Applicants to familiarize themselves with the proposed changes the first year (Table ES-4). The minimum threshold would now be published yearly along with the per capita indicator. Because Applicants already look up the per capita indicator, FEMA does not expect additional costs associated with also looking up the minimum threshold. The proposed changes could impose qualitative costs that FEMA was unable to quantify. Qualitative costs are discussed in Section 11 of the RIA. Transferring the costs of PA disasters to Applicants would require the Applicants to invest more in response, recovery, and mitigation capabilities. It is possible that without Federal assistance, Applicants may opt to not repair damaged facilities or pay for other recovery efforts. Damaged facilities that are not repaired or replaced could be more susceptible to subsequent incidents in the future.

Additionally, damaged facilities that are not repaired or replaced may no longer be used, which could be a significant loss of infrastructure to small governments who might opt to not repair damaged facilities due to fiscal limitations.

Table ES-4 Total Estimated Costs of the Proposed Rule (2018\$)

Year	Applicant Costs	FEMA Costs	Total Undiscounted Costs	Discounted	
				7%	3%
1	\$39,545	\$12	\$39,557	\$36,969	\$38,405
2	\$0	\$12	\$12	\$10	\$11
3	\$0	\$12	\$12	\$10	\$11
4	\$0	\$12	\$12	\$9	\$11
5	\$0	\$12	\$12	\$9	\$10
6	\$0	\$12	\$12	\$8	\$10
7	\$0	\$12	\$12	\$7	\$10
8	\$0	\$12	\$12	\$7	\$9
9	\$0	\$12	\$12	\$7	\$9
10	\$0	\$12	\$12	\$6	\$9
<i>Total</i>	\$39,545	\$120	\$39,665	\$37,042	\$38,496
<i>Annualized</i>				\$5,274	\$4,513

Benefits

FEMA is unable to quantify benefits of the proposed regulatory changes due to a lack of data on future impacts of adjusting declaration factors. FEMA instead focuses on qualitative benefits. The proposed regulatory changes would provide FEMA with a more accurate assessment of whether an incident has exceeded an Applicant's capabilities to respond to and recover from an incident. This is because the minimum threshold and per capita indicator have not consistently been updated to account for inflation, and not based on a State's fiscal capacity to respond. The proposed changes would ensure that these factors are taken into account. FEMA believes that the proposed changes would also incentivize Applicants to invest more in response, recovery, and mitigation capabilities, since Federal assistance would be focused on larger-scale disasters, and Applicants will have more responsibility to ensure they are adequately equipped to handle smaller disasters. This would provide a better distribution of responsibilities between the Applicants and the Federal government. These incentives would increase overall national preparedness for incidents. In addition, FEMA believes these changes to the PA declaration factors would result in a reduction in the number of declarations for smaller incidents, allowing FEMA to refine its focus and resources on larger incidents without the complications of reallocating response resources from multiple smaller-scale commitments, that States and local governments would have the capacity to manage without Federal assistance. FEMA requests public comment on the ability of Applicants to invest more in response, recovery, and mitigation capabilities.

Summary

Table ES-5 provides a summary of the annual and total quantified costs, cost savings, and reduction in transfers by category after implementation of the proposed rule, and Table ES-6 provides the A-4 accounting summary.

Table ES-5 Summary of Reduction in Transfers, Costs, and Cost Savings of the Proposed Rule

Transfer, Cost, or Cost Savings Item	Annual Undiscounted
Reduction in Transfers	
PA Funding	\$144,534,939
HMGP Funding	\$33,330,171
BRIC Funding	\$7,267,390
PA Management Cost Funding	\$17,344,193
HMGP Management Cost Funding	\$4,999,526
BRIC Management Cost Funding	\$1,282,481
Total Reduction in Transfers	\$208,758,700
Cost Savings	
Applicant Paperwork Cost Savings	\$8,035,714
FEMA Administrative Cost Savings	\$62,409,381
FEMA Paperwork Cost Savings	\$300,672
<i>Total FEMA Cost Savings</i>	<i>\$62,710,053</i>
Total Cost Savings (Applicants and FEMA)	\$70,745,767
Costs	
Applicant Costs	\$39,545
Year 1	\$0
Years 2-10	
FEMA Costs	\$12
Total Costs, Year 1	\$39,557
Total Costs, Years 2-10	\$12

Table ES-6 A-4 Accounting Statement (\$2018)

Period of analysis: 2008 to 2017

<i>Category</i>	<i>7 Percent Discount Rate</i>	<i>3 Percent Discount Rate</i>	<i>Source Citation (RIA, preamble, etc.)</i>
<i>BENEFITS</i>			
Annualized Quantified	N/A	N/A	
Qualitative	<ul style="list-style-type: none">• Provide FEMA with a more accurate assessment of whether an incident exceeds Applicant capabilities• Allow FEMA to focus efforts and resources on larger incidents• Provide better distribution of responsibilities between Applicants and the Federal government		RIA Section 12
<i>COSTS</i>			
Annualized Monetized \$millions/year	0.005274	0.004513	RIA Section 8
Annualized quantified	N/A	N/A	
Qualitative	<ul style="list-style-type: none">• Applicants would need to invest more in response, recovery, and mitigation capabilities• Damaged facilities may not be repaired or replaced, and could be susceptible to future disasters		
<i>COST SAVINGS</i>			
Annualized Monetized \$millions/year	70.75	70.75	RIA Section 8
<i>TRANSFERS</i>			
Annualized Monetized \$millions/year	208.76	208.76	RIA Section 9
From/To	Reduction in transfers from FEMA to PA Applicants		RIA Section 9
<i>Category</i>	<i>Effects</i>		<i>Source Citation (RIA, preamble, etc.)</i>
State, Local, and/or Tribal Government	Included in the Cost Savings is \$5.88 million in annual paperwork cost savings to Applicants. Included in the Transfers is \$8.48 million in PA funding that Tribal Applicants would not have received from 2008-20187. However, \$7.11 million of that funding would have potentially been available for Tribal governments that requested a disaster declaration under the Tribal Declarations Pilot Guidance.		RIA

Small business	There were 7,456 unique Applicants for the 159 removed PA disasters from 2008-2017. Using a sample size of 380, FEMA found that 79% were likely to be small entities (5,890 Applicants). The average PA funding received per small entity in the sample was \$168,046, with a range from a low of \$0 to a high of \$20.65 million. If the changes in the proposed rule were in effect, these entities would not have received this PA funding.	RFA (IRFA)
Wages	None	
Growth	None	

1. INTRODUCTION

This Regulatory Impact Analysis (RIA) provides a preliminary assessment of the potential impacts from the Cost of Assistance (COA) Estimates in the Disaster Declaration Process for the Public Assistance (PA) Program Notice of Proposed Rulemaking (NPRM). This report does not attempt to exactly replicate the regulatory language of the proposed rule or any other supporting documentation; the regulatory text, not the text of this report, would be legally binding. FEMA urges the reader to review the NPRM before reviewing this report. FEMA considers all estimates and analysis in this RIA to be preliminary and subject to change in consideration of public comments.

2. NEED FOR REGULATORY ACTION

FEMA proposes to amend the estimated cost of the assistance factor in 44 CFR 206.48. Pursuant to 44 CFR 206.48, FEMA considers several factors when determining whether to recommend that the President declare a major disaster authorizing the PA program. Since 1986, FEMA has evaluated the estimated cost of Federal and nonfederal PA against the statewide population and used a per capita dollar amount (set at \$1 in 1986) as an indicator that an incident may warrant Federal assistance. FEMA did not increase the indicator until 1999, when it began adjusting for inflation. Also, in 1999, FEMA established a \$1 million minimum threshold, meaning it would not recommend PA funding for a major disaster declaration unless there was at least an estimated \$1.0 million in PA eligible damage, which FEMA believed was a level of damage even the least populous States could handle with their own resources. FEMA has not increased this threshold since it was established.

The current per capita indicator and minimum threshold no longer provide an accurate measure of States' capabilities to respond to incidents. The lack of adjustments to the per capita indicator from 1986 to 1999 undercut the value of this factor as an indicator of State capacity given the inflationary increases during that time. FEMA's determination that all States had the fiscal capacity to respond to an incident of \$1.0 million in damages with their own resources is outdated given the inflation rate over the last 20 years.

The Government Accountability Office (GAO)⁵ and the Department of Homeland Security (DHS) Office of Inspector General (OIG)⁶ both recommended that FEMA develop and implement a methodology that better reflects current economic conditions and a more comprehensive assessment of a jurisdiction's capability to respond to and recover from an incident without Federal assistance. GAO and DHS OIG noted that the methodology should

⁵ See GAO, Disaster Assistance: Improvement Needed in Disaster Declaration Criteria and Eligibility Assurance Procedures, GAO-01-837 (2001) <https://www.gao.gov/assets/240/232622.pdf>; See also, GAO, GAO-12-838, Federal Disaster Assistance: Improved Criteria Needed to Assess Eligibility and a Jurisdiction's Capability to Respond and Recover On Its Own, 29 (2012). <https://www.gao.gov/assets/650/648162.pdf>

⁶ See Office of Inspector General, OIG-12-79, Opportunities to Improve FEMA's Public Assistance Preliminary Damage Assessment Process 3, DEPARTMENT OF HOMELAND SECURITY (2012). https://www.oig.dhs.gov/assets/Mgmt/2012/OIG_12-79_May12.pdf

decrease the frequency of disaster declarations and transfer some costs back to State and local jurisdictions. Additionally, GAO and the DHS OIG recommended that FEMA supplement the per capita indicator with more complete data on a jurisdiction's financial resources, such as total taxable resources (TTR), to obtain a more comprehensive assessment of the jurisdiction's ability to respond to an incident on its own. FEMA believes that increasing States' share of the cost of disasters may increase their incentives to invest in cost effective preparedness and mitigation measures.

More recently, Sections 1232 and 1239 of the Disaster Recovery and Reform Act of 2018 (DRRA) directed FEMA to review the factors considered when evaluating a request for a major disaster, particularly how it estimates the COA, to give greater consideration to the recent multiple disasters and severe local impact factors, and to initiate a rulemaking to update the factors.⁷ After review, FEMA proposes to revise its regulations to adjust the COA factor so that it may more closely adhere to the law which authorizes Federal disaster assistance only when an incident is beyond the capabilities of the affected State and local governments.

3. PROGRAM BACKGROUND

The Stafford Act authorizes the President to provide Federal assistance to an Applicant when the magnitude of an incident or threatened incident exceeds its capabilities to respond or recover from an incident. When a State, Territorial, or Tribal government determines that an incident may exceed its capabilities to respond, it requests a joint Preliminary Damage Assessment (PDA) with FEMA. Federal, State, Territorial, Tribal, and local governments, as well as certain private nonprofit (PNP) organization officials work together to estimate and document the impact and magnitude of the incident. The Governor or Indian Tribal Chief Executive requests a declaration from the President through the FEMA regional office. There are two types of declarations provided for in the Stafford Act: emergency declarations and major disaster declarations.⁸ An emergency declaration can be declared for any occasion or instance when the President determines Federal assistance is needed. FEMA is proposing to amend the factors it considers when recommending a major disaster declaration that authorizes PA. FEMA is not proposing any changes to the emergency declaration process. Therefore, the proposed rulemaking only impacts major disaster declaration requests from a Governor.⁹

A major disaster declaration authorizes FEMA to provide supplemental Federal disaster assistance. Not all programs are activated for every declaration. The determination of which programs are authorized is based on the types of assistance specified in the Governor's request and the needs identified during the joint PDA and any subsequent PDAs. The declaration

⁷ See Section 1239 of the Disaster Recovery Reform Act, (Oct. 5, 2018), found at <https://www.congress.gov/bill/115th-congress/house-bill/302/text?q=%7B%22search%22%3A%5B%22HR+302%22%5D%7D&r=1>.

⁸ For further information on FEMA's disaster declaration process, see <https://www.fema.gov/disaster-declaration-process>.

⁹ An Indian Tribal Chief Executive may make a direct request for a major disaster declaration. To consider such requests FEMA relies on Tribal Declarations Pilot Guidance found at <https://www.fema.gov/media-library/assets/documents/128307>.

designates the types of Federal assistance authorized. FEMA disaster assistance programs that could be activated by a major disaster declaration include Individual Assistance (IA), Public Assistance (PA), the Hazard Mitigation Grant Program (HMGP). Through the IA program, FEMA provides direct assistance to individuals and households, as well as State, Tribal, and local governments to support individual survivors. Through the PA program, FEMA provides funds to State, Tribal, and local governments and certain types of PNP organizations for debris removal, emergency protective measures, and the restoration of disaster-damaged, publicly owned facilities and the facilities of certain PNP organizations. Through the HMGP program, FEMA provides funds to State, Tribal, and local governments and certain PNP organizations to prevent or reduce long term risk to life and property from natural hazards. A major disaster declaration also authorizes FEMA to set aside an amount equal to 6 percent of the estimated amount of the grants to be made under each major disaster declaration to fund a pre-disaster mitigation program called Building Resilient Infrastructure and Communities (BRIC).¹⁰

When evaluating requests for major disaster declarations and making recommendations to the President, FEMA considers different factors for the PA and IA programs. The factors considered for the IA program include: State fiscal capacity and resource availability, uninsured home and personal losses, disaster impacted population profile, impact to community infrastructure, casualties, and disaster related unemployment. The proposed rule would not impact any of the IA program factors or the IA program.

The factors considered for the PA program include: estimated cost of the assistance (COA), localized impacts, insurance coverage in force, hazard mitigation, recent multiple disasters, and programs of other Federal assistance. FEMA is proposing to revise the estimated COA factor that it uses to review a request for a major disaster declaration under the PA program. The COA factor includes a per capita indicator and a minimum threshold. Through the COA, FEMA compares the estimated cost of potentially eligible PA damage against the pre-determined per capita indicator for the State as one means of assessing whether the State is overwhelmed and in need of Federal assistance.¹¹ FEMA began informally using the per capita indicator in 1986 and set it at \$1. In 1999, FEMA issued a rule to codify the per capita indicator at \$1 and establish that FEMA would annually adjust the per capita for inflation based on CPI-U. The first adjustment for inflation occurred in 2000.¹² The per capita indicator was set at \$1.50 for all States in FY2019.¹³ FEMA multiplies the per capita indicator by each State population to find the overall State-specific COA indicator. The State COA indicator establishes an amount of PA eligible

¹⁰ See 42 U.S.C. 5133, as amended by Section 1234 of the Disaster Recovery Reform Act of 2018.

¹¹ In applying the COA factor FEMA considers only the damage that would meet PA eligibility if there were a declaration. FEMA provides guidance on what damages qualify for the PA program. For more information on facility, general work, cost, emergency work, and permanent work eligibility, see FEMA's Public Assistance Program and Policy Guide, FP 104-009-2/April 2018, available at https://www.fema.gov/media-library-data/1525468328389-4a038bbef9081cd7dfe7538e7751aa9c/PAPPG_3.1_508_FINAL_5-4-2018.pdf.

¹² The \$1 per capita indicator was established in the Disaster Assistance; Factors Considered when Evaluating a Governor's Request for a Major Disaster Declaration Final Rule, effective October 1, 1999, found at <https://www.govinfo.gov/content/pkg/FR-1999-09-01/pdf/99-22510.pdf>. FEMA gave notice of the first update to the per capita indicator on October 16, 2000, found at <https://www.federalregister.gov/documents/2000/10/16/00-26536/notice-of-adjustment-of-disaster-grant-amounts>.

¹³ FEMA, Per Capita Indicator and Project Thresholds available at: <https://www.fema.gov/public-assistance-indicator-and-project-thresholds>.

damage that FEMA can reasonably expect a State to cover on its own. FEMA's current practice is to use the US Census Bureau decennial State census population data to calculate the State COA indicator.¹⁴

When considering recommending a major disaster declaration authorizing PA, FEMA compares the estimated PA eligible damage to both the current minimum threshold of \$1.0 million and to the State COA indicator. The minimum threshold is the level of PA damage that FEMA reasonably expects even the least populated States to cover without supplemental Federal assistance.¹⁵ As the COA factor is one of only six factors FEMA considers, FEMA could recommend a major disaster declaration authorizing PA for an incident that does not exceed either the minimum threshold or the State COA indicator based on the other factors.

When PA funding is authorized for a disaster declaration, funding may also be authorized for HMGP. In addition, for each major disaster declaration FEMA may set aside an amount equal to 6 percent of the estimated amount of the total grants to be made available to Applicants under the declaration to fund the BRIC program. FEMA thus included the impacts of the proposed rule on the HMGP and BRIC programs in this RIA.

4. SUMMARY OF REGULATORY CHANGES

FEMA proposes the following changes in the NPRM.

- Increase the per capita indicator from the current FY2019 value of \$1.50 to \$2.32 to account for inflation from 1986 to 1999 and then adjust the individual States' indicators by their total taxable resources (TTR).¹⁶ As there is not a mechanism to calculate TTR for territories, the per capita indicator for territories would not be adjusted by TTR or the equivalent.
- Increase the minimum threshold from \$1.0 million to \$1.535 million to account for inflation between 1999 and present day, and then adjust the threshold for inflation by CPI-U annually.
- Use the US Census Bureau's annual population estimates produced under the Population Estimates Program (PEP) instead of the decennial census population counts produced every 10 years.¹⁷ FEMA's current practice is to use the US Census Bureau decennial census population data to calculate the State COA indicator. Since PEP does not produce annual estimates for American Samoa, Guam, Commonwealth of the Northern Mariana Islands, and the US Virgin Islands, FEMA would continue to use the decennial population data to calculate these State COA indicators. See the Alternatives section of

¹⁴ United States Census Bureau State Population Totals: 2010-2019 dataset, as found at <https://www.census.gov/programs-surveys/popest/data/data-sets.2010.html>. The latest decennial data available at the time of this analysis was 2010.

¹⁵ For FY2019, the following states and territories had State thresholds below \$1,000,000 and would be subject to the minimum threshold: District of Columbia, Vermont, Wyoming, American Samoa, Commonwealth of the Northern Mariana Islands, Guam, and U.S. Virgin Islands.

¹⁶ FEMA is not proposing to adjust the per capita indicator for TTR for the territories or DC.

¹⁷ See <https://www.census.gov/programs-surveys/popest/about.html> for more information on PEP.

this RIA for further information on how different population sources would impact the number of major disaster declarations.

- Make minor technical and corresponding grammatical changes to all of Section 206.48(a) to ensure consistent language between the PA declaration factors in 44 CFR 206.48(a) and the IA factors in 44 CFR 206.48(b). FEMA proposes to replace all uses of the term “we” in 44 CFR 206.48(a) with “FEMA.” FEMA also proposes minor corresponding edits to account for the change to the use of “FEMA” to ensure proper grammar.

Table 4-1 summarizes the proposed changes and the impacts.

Table 4-1 Summary of Proposed Changes and Impacts

Item	Current	Proposed Change	Impact
Revise per capita indicator in 44 CFR 206.48 (a)(1), estimated COA, to account for inflation and TTR	\$1.50 in FY2019, adjusted annually for inflation using CPI-U	\$2.32, adjusted annually for inflation from 1986 to 1999 using CPI-U, and adjusted for State TTR	<ul style="list-style-type: none"> -Account for inflation from 1986-1999 -Reduce the number of disaster declarations for smaller incidents -Transfer COA for smaller incidents from FEMA to Applicants -FEMA administrative cost savings -Paperwork cost savings for Applicants and FEMA -Costs to FEMA to adjust per capita indicator by State TTR -Applicants would need to invest more in mitigation capabilities -Without Federal assistance, damaged facilities may not be repaired or replaced
Revise minimum threshold in 44 CFR 206.48 (a)(1), estimated COA, to account for inflation	\$1,000,000	\$1,535,000, adjusted annually for inflation since 1999 using CPI-U	<ul style="list-style-type: none"> -Account for inflation from 1999 -Reduce the number of disaster declarations for smaller incidents -Transfer COA for smaller incidents from FEMA to Applicants -FEMA administrative cost savings -Paperwork cost savings for Applicants and FEMA -Applicants would need to invest more in mitigation capabilities -Without Federal assistance, damage facilities may not be repaired or replaced
Technical edits to 44 CFR 206.48 (a)	44 CFR 206.48(a) refers to FEMA using "we"	Replace all uses of the term “we” with “FEMA” and minor corresponding edits	<ul style="list-style-type: none"> -Create consistency with IA declaration factors in 44 CFR 206.48 (b) -No quantifiable impacts
Population data source used in FEMA practice to calculate State COA indicator	U.S. Census Bureau decennial census data	U.S. Census Bureau PEP annual data	<ul style="list-style-type: none"> -Capture fluctuations in State populations annually rather than every 10 years. -Phases in increases and decreases so that a State with a rapidly increasing population would not experience a large increase in their threshold when decennial data becomes available.

5. METHODOLOGY AND ASSUMPTIONS

Due to the nature of disasters, FEMA cannot predict or accurately forecast disasters over a 10-year period. FEMA also can neither predict which programs would be authorized for future disasters nor how much funding would be obligated. Because of this, FEMA conducted a 10-year retrospective analysis of the major disaster declarations authorizing PA to determine the baseline and estimate the impacts of the proposed rule and the alternatives. FEMA used the data for the major disasters that were declared from fiscal years (FY) 2008-2017 to estimate how the proposed rule would impact major disaster declarations and the costs, benefits, and transfers associated over a 10-year period. FEMA updates the per capita indicator and minimum threshold on a FY basis, so the years in this analysis are presented as FY. FEMA recognizes a future 10-year period could vary drastically from the 2008-2017 period. However, this is the best estimate given the data available and the unpredictability of the number, size, and cost of future major disasters.

The costs and funding reported for a major disaster fluctuate significantly within the first year of the date of the major disaster. The actual costs and funding of major disasters are not realized until a disaster is closed, and all the financial transactions are complete. The values reported in this analysis include data for disasters that have not yet been closed and whose costs may change based on future expenditures. FEMA assumed the data for the major disasters from 2008-2017 were settled enough to include in the analysis. FEMA did not include FY 2018 data as these costs were still fluctuating significantly at the time of this analysis.

FEMA included only those major disasters that activated the PA program (hereafter referred to as PA disasters) in its analysis. FEMA excluded any major disaster declarations that activated only the IA program, and Tribal disaster declarations. The proposed rule would not impact the disaster declaration factors that FEMA uses to review a request for a major disaster under the IA program. A recommendation for a major disaster declaration under the IA program can be made regardless of the factors for the PA program. The proposed rule would not impact the Tribal declaration process and would not have impacted any Tribal declarations that activated PA funding over the period of analysis. The impacts to Tribal governments are discussed further in Section 13 of this RIA.

For major disaster declarations that activated the PA and IA program, FEMA only included the PA program specific funding in the analysis to the extent possible given data constraints. As described in Section 3, when a major disaster declaration authorizes PA, IA, or both PA and IA funding, HMGP may also be authorized. Additionally, FEMA may also set aside funding for funding for BRIC. The amount of HMGP and BRICBRIC funding which may be made available is based on the estimated aggregate amount of grants to be made for the disaster.¹⁸

¹⁸ Specifically, the amount available for HMGP may not exceed 15 percent for amounts not more than \$2,000,000,000, 10 percent for amounts of more than \$2,000,000,000 and not more than \$10,000,000,000, and 7.5 percent on amounts of more than \$10,000,000,000 and not more than \$35,333,000,000 of the estimated aggregate

FEMA used PA data from FEMA's Enterprise Data Warehouse (EDW) to pull data for this analysis. The data available in EDW only gives the total amounts of funding. It does not make the distinction whether the funding was associated with IA or PA funds. FEMA has a public website where it provides the total assistance for disaster declarations by disaster number.¹⁹ The total assistance for each disaster on the website is also broken down by IA and PA assistance. For each of the 159 PA disasters that did not exceed the proposed State COA indicator and minimum threshold (as estimated in Section 8.1), FEMA looked up the IA funding for each of the PA disasters on the public website. FEMA multiplied the IA amount by 15 percent to estimate the amount set aside for HMGP, and 6 percent to estimate the amount set aside for BRIC for the IA amount (described further in Sections 7.2.2 and 7.2.3). FEMA then subtracted these amounts associated with IA funding from the baseline HMGP and BRIC funding amounts to refine the estimates of the transfers.

There were also limitations to the administrative cost data. FEMA records administrative costs per disaster but does not break out the costs by programs. For major disaster declarations that activated both the PA and IA program, FEMA could only include the total administrative cost for the disaster. FEMA was not able to break out the costs between IA, PA, and HMGP. BRIC had not been implemented at the time of this analysis.

Throughout the RIA, FEMA refers to using the project amount or the Federal share obligated to estimate the impacts of the proposed rule. The Federal share obligated is the amount of funding provided to Applicants and is the amount FEMA used to estimate the funding transfers in the RIA. The project amount is the total amount that FEMA recorded was spent on the PA disaster and it includes both State and Federal money. FEMA reviews the PA eligible damage estimated in the preliminary damage assessments (PDA) when considering whether to recommend a PA disaster. However, FEMA used the project amounts to estimate which PA disasters would have exceeded the minimum threshold and the State COA indicator. This is because of data limitations concerning the PDA figures. When estimating the damages for the PDA, States have little incentive to refine the damage estimates once they can show the PA eligible damages exceeds the minimum threshold and State COA indicator. Therefore, project amounts are a reasonable proxy for PDAs.

To estimate the impacts of the proposed rule, FEMA first identified the baseline PA disasters that occurred from 2008-2017. FEMA then found the funding and costs associated with these PA disasters to estimate the baseline condition. FEMA included in the baseline all costs and funding that are triggered by a PA disaster and would be impacted by the proposed rule. The baseline included the PA, HMGP, and BRIC funding that FEMA provided the recipients and subrecipients, any FEMA administrative costs, and the paperwork costs.

FEMA also incorporated changes directed by the DRRA into historical PA disaster data to more accurately estimate the impacts of the proposed rule on a future 10-year period of analysis. Specifically, FEMA incorporated the changes directed by DRRA Sections 1234 for

amount of grants to be made (unless the State has an enhanced plan which would increase the available amount.) 42 U.S.C. 5170c. For BRIC, FEMA may set aside up to six percent of the estimated aggregate amount of grants to be made for the disaster to fund future cycles of the program. 42 U.S.C. 5133(i).

¹⁹ FEMA, Disaster Declarations by year, found at: <https://www.fema.gov/disasters/year>.

calculating the PDM funding and Section 1215 for calculating PA and HMGP management costs. These changes are discussed in Sections 7.2.3 and 7.2.4 of this RIA.

After finding the baseline condition, FEMA then estimated the funding and costs associated with the PA disasters that would still be declared if the proposed rule had been implemented at the time. To estimate this, FEMA identified which PA disasters had project amounts that exceeded the proposed minimum threshold and the State COA indicator (calculated using the proposed per capita indicator, adjusted for TTR and using PEP population data).

The COA factor is not the only factor FEMA considers when recommending a PA disaster, and it is the sole authority of the President to make a declaration. To estimate the impacts from changing only the COA factor in this RIA, FEMA held all other factors constant and assumed any PA disaster that did not exceed the proposed minimum threshold and State COA indicator would not have been declared, and those that exceeded both would still have been declared.

FEMA then subtracted the funding and costs that would have occurred after implementation of the proposed rule from the baseline condition to find the estimated costs, cost savings, and reduction in transfers if the proposed rule had been in effect. Unless otherwise noted, all values are presented in 2018 dollars.

6. AFFECTED POPULATION

The proposed rule would directly affect all applicants that are eligible to request a PA disaster. Eligible applicants for PA include: State and Territorial governments, including the District of Columbia, American Samoa, the Commonwealth of the Northern Mariana Islands, Guam, Puerto Rico, and the US Virgin Islands; Federally recognized Indian Tribal Governments (Tribal governments), including Alaska Native villages and organizations;²⁰ local governments; and certain PNPs that have been affected by a disaster.²¹

The affected population is referred to as different terms throughout the PA program process and depending on whether the entity received an award directly from a Federal awarding agency. The terms are defined by 2 CFR Part 200 and the PA Program and Policy Guide (PAPPG)²² as:

²⁰ As noted above, only Tribal governments that request PA funding through a State requested major disaster declaration (e.g., as a subrecipient) are affected by the proposed rule. The process for Tribal governments to directly request a disaster declaration is not affected by this proposed rule.

²¹ To be an eligible private nonprofit applicant, the private nonprofit must show that it has: a current ruling letter from the U.S. Internal Revenue Service granting tax exemption under sections 501(c), (d), or (e) of the Internal Revenue Code of 1954; or documentation from the State substantiating it is a non-revenue producing, nonprofit entity organized or doing business under State law. Additionally, prior to determining whether the private nonprofit is eligible, FEMA must first determine whether the private nonprofit owns or operates an eligible facility.

²² Public Assistance Program and Policy Guidance, FP 104-009-2/April 2018, page X, found at https://www.fema.gov/media-library-data/1525468328389-4a038bbef9081cd7dfe7538e7751aa9c/PAPPG_3.1_508_FINAL_5-4-2018.pdf.

- Recipient: a non-Federal entity that receives a Federal award directly from a Federal awarding agency to carry out an activity under a Federal program
- Applicant: a non-Federal entity applying for assistance under the Recipient's Federal award
- Pass-through entity: a non-Federal entity that provides a subaward to a subrecipient
- Subrecipient: a non-Federal entity that receives a subaward from a pass-through entity

For simplicity and to maintain consistency with the PA program guidance, FEMA uses the term Applicant throughout this RIA when referring to the State, Territorial, Tribal, and local governments that were the responsible entity for a PA project rather than make the distinction between an entity as an Applicant, Recipient, pass-through entity, or Subrecipient.²³ FEMA makes the distinction between State, local, and Tribal governments when necessary.

FEMA reviewed the PA disasters that it identified that likely would not have been declared from 2008-2017 due to the proposed rule, as presented in Table 8-1 in Section 8 of this RIA, to estimate the number of Applicants to which the proposed rule would have applied from 2008-2017. For each of the 159 PA disasters removed, FEMA used PA data in FEMA's EDW database to identify the Applicants for each of the PA disasters. FEMA found there were 7,456 unique Applicants for the removed 159 PA disasters. These Applicants would have a reduction in grant funding, including funding and management costs for PA, funding and management costs for HMGP, and PDM funding. These Applicants would also see paperwork cost savings from not filling out the forms to determine eligibility and receive funding.

7. BASELINE

To properly evaluate the benefits and costs of regulations, agencies must evaluate the costs and benefits against a baseline. OMB Circular A-4 defines the "no action" baseline as "the best assessment of the way the world would look absent the proposed action."²⁴

To determine the baseline, FEMA identified the PA disasters from 2008-2017. FEMA then identified the funding and costs associated with these PA disasters. FEMA included in the baseline all costs and funding that are triggered by a PA disaster and would have been impacted by the proposed rule. The baseline includes any PA or HMGP or BRIC funding transfers that FEMA provided the Applicants, any FEMA administrative costs, and the paperwork costs for the Applicants and FEMA. The baseline funding transfers FEMA provided the Applicants includes PA, HMGP, and BRIC project and management cost funds.

²³ FEMA counted the number of applications for PA, but some applicants may have applied for multiple PA projects or through multiple disasters. It is possible that some applicants were counted more than once, but FEMA was unable to separate this number out from the total.

²⁴ OMB Circular No. A-4 available at <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/assets/OMB/circulars/a004/a-4.html>.

7.1 Baseline Number of Disasters

To determine the baseline, FEMA identified the PA disasters over the 10-year period of analysis using Enterprise Data Warehouse (EDW), FEMA's primary PA database. EDW provides data and reporting services to all FEMA employees and contractors. FEMA collects Applicant and PA disaster data using the PA database in EDW. EDW stores information from the PA project worksheets that are used to collect data for all PA projects. The PA data stored in EDW includes: Applicant name, Applicant address, associated disaster declaration number (as assigned by FEMA), total project amount, Federal share amount obligated to the applicant, scope of work, and other information necessary for the administration of the PA program.

FEMA reviewed the EDW PA data to identify the unique PA disasters that occurred during 2008-2017. FEMA found there were a total of 585 PA disasters from 2008-2017, or an average of 59 PA disasters per year in the US and the territories (rounded). Table 7-1 shows the PA disasters for the 10-year period of analysis.

Table 7-1 2008-2017 PA Disasters

Fiscal Year	Number of Disasters
2008	61
2009	62
2010	79
2011	97
2012	42
2013	60
2014	46
2015	42
2016	41
2017	55
Total	585
Average	59

Tables 7-2 and 7-3 list the top 10 States that would have seen a decrease in the number of declared disasters and the States that would have had the greatest decrease in PA funding from 2008-2017 based on changes to the per-capita indicator and minimum threshold.

Table 7-2 Reduction in Number of Disasters by State 2008-2017

State	Reduction in Disasters
Oklahoma	11
Tennessee	10
New York	8
California	7
New Jersey	7
Texas	7
Kentucky	6

New Hampshire	5
South Dakota	5
Arkansas	4

Table 7-3 Reduction in PA Funding by State 2008-2017 (2018\$)

State	Reduction in Funding
California	\$381,072,449
New York	\$312,927,024
Texas	\$271,132,106
New Jersey	\$107,384,830
Tennessee	\$78,945,989
Illinois	\$71,819,014
Florida	\$61,385,783
Georgia	\$60,426,818
Virginia	\$56,959,085
Oklahoma	\$54,574,918

7.2 Baseline Funding Transfers to Applicants

Table 7-4 provides a summary of the funding FEMA provided to the Applicants for the baseline PA disasters from 2008-2017. The funding provided to the Applicants is a transfer from FEMA to the Applicants. As stated in Section 5, the actual cost of PA disasters fluctuates until the disaster is closed. The values provided are as of December 20, 2018 when FEMA pulled the data from EDW. A summary of each funding type follows. All values were converted to 2018 dollars using CPI-U data.

Table 7-4 Baseline Funding Transfers to Applicants from FEMA (2018\$)

Fiscal Year	PA Funding	HMGP Funding	BRIC Funding*	PA Management Cost Funding	HMGP Management Cost Funding	BRIC Management Cost Funding*
2008	\$6,713,709,626	\$1,132,500,752	\$342,399,191	\$805,645,155	\$169,875,113	\$60,423,387
2009	\$1,970,652,167	\$375,254,629	\$100,503,261	\$236,478,260	\$56,288,194	\$17,735,870
2010	\$1,775,483,117	\$383,547,026	\$90,549,639	\$213,057,974	\$57,532,054	\$15,979,348
2011	\$4,055,356,221	\$513,051,360	\$206,823,167	\$486,642,747	\$76,957,704	\$36,498,206
2012	\$1,062,979,027	\$117,693,877	\$62,965,235	\$127,557,483	\$17,654,082	\$11,111,512
2013	\$19,027,218,116	\$1,723,126,474	\$520,379,201	\$2,283,266,174	\$258,468,971	\$91,831,624
2014	\$1,142,308,136	\$215,365,979	\$63,932,004	\$137,076,976	\$32,304,897	\$11,282,118
2015	\$1,150,368,895	\$216,109,592	\$65,228,839	\$138,044,267	\$32,416,439	\$11,510,972
2016	\$1,920,589,054	\$353,114,959	\$183,996,529	\$230,470,687	\$52,967,244	\$32,469,976
2017	\$10,227,423,904	\$1,967,720,901	\$567,011,265	\$1,227,290,868	\$295,158,135	\$100,060,811
Total	\$49,046,088,263	\$6,997,485,549	\$2,203,788,330	\$5,885,530,591	\$1,049,622,832	\$388,903,823
Average	\$4,904,608,826	\$699,748,555	\$220,378,833	\$588,553,059	\$104,962,283	\$38,890,382

*FEMA was able to estimate BRIC amounts for 2012-2017 based on historical PA data. FEMA did not have 6-month disaster estimate data available to estimate BRIC allocations for 2008-2011, so FEMA used 6 percent of total PA funding per fiscal year for 2008-2011.

7.2.1 PA Funding

Under the PA Program FEMA provides funds to Applicants for debris removal, emergency protective measures, roads and bridges, water control facilities, buildings and equipment, utilities, and parks, recreational and other facilities. To estimate the baseline for PA funding, FEMA reviewed the PA disaster data for the baseline disasters identified in Table 7-1. The FEMA PA disaster data includes the Federal share obligated, which is the total amount that FEMA gave to the Applicants for each PA disaster. Table 7-4 shows the historical sum of the total Federal share obligated for each year as of December 20, 2018. The total PA funding from 2008-2017 was \$49.05 billion, an average of \$4.90 billion per year. PA funding ranged from a low of \$1.06 billion in 2012 to a high of \$19.03 billion in 2013.

7.2.2 HMGP Funding

The baseline includes HMGP funding made available for PA disasters. The purpose of HMGP funding is to take mitigation measures to reduce the risk of loss of life and property from future disasters. When a disaster declaration is authorized for the IA or PA program, or both programs, HMGP funding can be made available to the Applicants. HMGP is authorized under Section 404 of the Stafford Act, which states that HMGP contributions for a major disaster “shall not exceed 15 percent for amounts not more than \$2,000,000,000, 10 percent for amounts of more than \$2,000,000,000 and not more than \$10,000,000,000, and 7.5 percent on amounts of more than \$10,000,000,000 and not more than \$35,333,000,000.”²⁵

To estimate the baseline HMGP funding, FEMA used HMGP data for each of the baseline PA disasters. FEMA summed the Federal share available for each PA disaster by year. The total HMGP funding from 2008-2017 was \$7.00 billion, an average of \$699.75 million per year. HMGP funding ranged from a low of \$117.77 million in 2012 to a high of \$1.97 billion in 2017.²⁶

7.2.3 BRIC Funding

BRIC funding is designed to assist Applicants in implementing sustained pre-disaster natural hazard mitigation programs and reduce overall risk to the population and structures from future hazard incidents, while also reducing reliance on Federal funding in future disasters. BRIC replaced the previous pre-disaster mitigation (PDM) program which was funded by annual Congressional appropriations rather than disaster grant estimates. This means PDM had no relationship to, or dependency on, major disaster declarations authorizing PA.

This changed in 2018 when Section 1234 of the DRRRA amended the PDM program. One of the amendments made funding dependent on major disaster declarations by authorizing FEMA

²⁵ Section 404 of the Stafford Act, Hazard Mitigation (42 U.S.C. 5170c), <https://www.fema.gov/media-library-data/1519395888776-af5f95a1a9237302af7e3fd5b0d07d71/StaffordAct.pdf>, page 29.

²⁶ As described in Section 5, baseline HMGP figures also include HMGP that was made available as a result of a declaration that activated both IA and PA funding for those disasters that were not impacted by the proposed changes.

the President to set aside for each major disaster declaration an amount equal to 6 percent of the estimated aggregate amount of grants to be made under the declaration.²⁷ To implement all of the amendments to the program, FEMA decided to end the PDM program and replace it with BRIC. If FEMA evaluated the baseline using the past practice of PDM funds being appropriated by Congress, the rulemaking would have no impact as the appropriations would not have been dependent on a PA disaster declaration. Since FEMA, however, knows that future BRIC funding will be dependent on major disaster declarations, FEMA includes an analysis of what the BRIC funding would have been in past disasters had the changes from the DRRRA been applicable at that time. FEMA does this to give a better estimate as to how the rulemaking could impact BRIC funding.

Section 1234 of the DRRRA specifies that FEMA must estimate the 6 percent set aside no later than 180 days after each disaster declaration and that this estimate does not need to change due to any variations in FEMA's estimates of the costs over the life of the disaster. Going forward FEMA's current practice is to determine the BRIC set-aside amount at the 6-month mark of the disaster. FEMA's past projections at the 6-month mark of the total Federal share to be obligated for the PA disasters at the 6-month mark will therefore provide a baseline of what BRIC funding would have been in past disasters had the changes from the DRRRA applied and provide an estimate as to how the proposed rule could impact future BRIC funding. FEMA's data, however, is insufficient to create what FEMA's 6-month projection would have been for PA disasters prior to 2012. Therefore, FEMA calculated 6 percent of the total amount of PA funding to derive the amount of BRIC from 2008-2011 and relies on 6-month projections for PA life of disaster costs for the years 2012-2017. Table 7-5 shows the 6-month projected PA disaster cost for the baseline PA disasters and concludes that FEMA would have been authorized to set aside an average of \$269.20 million of funding from PA disasters per year for BRIC. FEMA notes that the amount presented is how much would have been available each year, not necessarily how much would have been dispersed each year.

²⁷ Section 203 of the Stafford Act, Predisaster Hazard Mitigation (42 U.S.C. 5133), <https://www.govregs.com/uscode/42/5133>.

Table 7-5 PA 6-Month FEMA Estimate of Total Disaster Cost and PA Funding (2018\$)

Fiscal Year	PA Funding/6-Month Projected Cost of PA Assistance	Total Estimated BRIC Funding
2008	\$6,713,709,626	\$402,822,578
2009	\$1,970,652,167	\$118,239,130
2010	\$1,775,483,117	\$106,528,987
2011	\$4,055,356,221	\$243,321,373
2012	\$1,234,612,442	\$74,076,747
2013	\$10,203,513,755	\$612,210,825
2014	\$1,253,568,695	\$75,214,122
2015	\$1,278,996,841	\$76,739,810
2016	\$3,607,775,087	\$216,466,505
2017	\$12,772,652,930	\$766,359,176
<i>Total</i>	\$44,866,320,881	\$2,691,979,253

7.2.4 Management Cost Funding

Applicants that are awarded PA, HMGP or BRIC grants pursuant to a major disaster or emergency declaration are eligible to apply to FEMA for management cost funding. Management costs are additional funds FEMA provides Applicants for managing their PA and HMGP grants. Management costs are any indirect costs, administrative expenses, and any other expenses not directly chargeable to a specific project that are reasonably incurred by an Applicant in administering and managing a PA, HMGP, or BRIC grant award.²⁸ Section 1215 of the DRRA amended the management cost rates.²⁹ For PA management cost funding, an Applicant may be reimbursed for not more than 12 percent of the total amount of the Federal share obligated (maximum of 7 percent for the recipient and 5 percent for the subrecipient). For HMGP and BRIC management cost funding, an Applicant may be reimbursed for not more than 15 percent of the total amount of the Federal share obligated (maximum of 10 percent for the recipient and 5 percent for the subrecipient).³⁰

While these percentages are maximum amounts, FEMA assumed the Applicant would have received the full percentage allowed. It is possible an Applicant would not have received the full amount, as the Applicant must be able to show through documentation that they spent the full amount. Since these percentages were recently amended by DRRA, FEMA lacks the data to estimate what percentage of the Applicants would not have received the full amount of management cost funding. Therefore, FEMA uses the full percentage allowed to obtain an upper bound estimate. To estimate the baseline PA management cost funding, FEMA

²⁸ 44 CFR § 207.2 Definitions.

²⁹ Section 324 of the Stafford Act, Management Costs (42 U.S.C. 5165b), [https://uscode.house.gov/view.xhtml?req=\(title:42%20section:5165b%20edition:prelim\)](https://uscode.house.gov/view.xhtml?req=(title:42%20section:5165b%20edition:prelim)).

³⁰ Id.

multiplied the total Federal share obligated for PA (table 7-4, column 2) each year by 12 percent. The total PA management funding from 2008-2017 was \$5.89 billion, with an average of \$588.55 million per year. PA management cost funding ranged from a low of \$127.56 million in 2012 to a high of \$2.28 billion in 2013. To estimate the baseline HMGP management cost funding, FEMA multiplied the total amount available for HMGP (table 7-4, column 3) each year by 15 percent. The total HMGP management funding from 2008 through 2017 was \$1.05 billion, with an average of \$104.96 million per year. HMGP management cost funding ranged from a low of \$17.65 million in 2012 to a high of \$295.16 million in 2017. To estimate the baseline BRIC management funding, FEMA took 15 percent of the estimated total Federal share obligated for BRIC (table 7-4, column 4). The total estimated BRIC management cost funding from 2008 through 2017 would have been \$388.9 million with an average of \$38.89 million. BRIC management costs ranged from a low of \$11.1 million in 2012 to a high of \$100.06 million in 2017.

7.3 Baseline Administrative Costs

FEMA administrative costs for PA disasters include disaster related personnel costs such as salaries, benefits, and travel; the cost of tasking another Federal agency to support operations (mission assignments); technical assistance contracts associated with the execution of PA, Hazard Mitigation, and Housing Assistance programs, and general administrative costs such as leases, communications, supplies, and equipment that are incurred from declaration to disaster closure. Administrative costs exclude program costs associated with mission assignments for direct Federal assistance, urban search and rescue costs, and all other program deliverables and assistance such as grants to survivors. FEMA tracks the administrative costs for each disaster in EDW. FEMA pulled the administrative cost in EDW for each PA disaster in the baseline, and then summed the costs per year to find the baseline administrative costs.³¹ Table 7-6 presents the FEMA administrative costs over the period of analysis. The total FEMA administrative costs for the PA disasters from 2008-2017 were \$16.79 billion, an average of \$1.68 billion per year. The administrative costs ranged from a low of \$339.32 million in 2012 to a high of \$7.53 billion in 2017.

³¹ Administrative data was pulled from EDW on March 11, 2019.

Table 7-6 Baseline FEMA Administrative Costs (2018\$)

Fiscal Year	FEMA Administrative Costs
2008	\$2,054,613,717
2009	\$633,442,829
2010	\$670,825,910
2011	\$1,366,425,633
2012	\$339,318,980
2013	\$2,139,527,898
2014	\$396,845,331
2015	\$454,490,425
2016	\$1,204,519,512
2017	\$7,533,327,855
Total	\$16,793,338,090
Average	\$1,679,333,809

FEMA notes that there are limitations to the administrative cost data. FEMA records administrative costs per disaster but does not break out the costs by programs. For major disaster declarations that activated both the PA and IA program, FEMA could only include the total administrative cost for the disaster and could not break out how much of the costs were attributed to the IA program to remove it from the baseline. Therefore, the baseline administrative costs in Table 7-6 represent upper bound estimates. The actual amount of PA administrative cost is likely much lower than what is presented here, so FEMA’s estimates of the impact of this proposed rule on administrative costs are likely overstated.

7.4 Baseline Paperwork Costs

The paperwork costs include the costs for Applicants to complete the form to request a major disaster declaration, costs for Applicants to complete a request for PA, costs for Applicants to complete the forms for PA program eligibility, and the costs for FEMA to review the forms. FEMA used the time burden and cost estimates from two existing Collections of Information (COI) to estimate the baseline costs to Applicants and to FEMA. The two COIs used were entitled “The Declaration Process: Requests for Preliminary Damage Assessment (PDA), Requests for Supplemental Federal Disaster Assistance, Appeals, and Requests for Cost Share Adjustments”, which has OMB Control Number 1660-0009 (hereafter referred to as COI number 1660-0009), and “Public Assistance Program”, which has OMB Control Number 1660-0017 (hereafter referred to as COI number 1660-0017).³² FEMA used the same time

³² “Public Assistance Program”, OMB Control Number 1660-0017 can be found in the Supporting Statement Part A found at https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202003-1660-001. The most recently approved ICR at the time of this analysis was ICR Reference Number 202003-1660-001. “The Declaration Process: Requests for Preliminary Damage Assessment (PDA), Requests for Supplemental Federal Disaster Assistance, Appeals, and Requests for Cost Share Adjustments”, OMB Control Number 1660-0009 can be found

burdens and cost estimates from these COIs in this analysis to maintain consistency and to capture the changes resulting from only the proposed rule. FEMA included only the burden from the COIs that would be impacted by the proposed rule in the baseline paperwork estimates. For COI number 1660-0009, FEMA costs for completing a joint PDA and traveling were not included in the baseline, as the proposed rule would not impact the IA program. For COI number 1660-0017, FEMA did not include the burden for Applicants to complete an annual State Administrative plan and quarterly progress reports in the baseline as Applicants would still have to complete these items even if the proposed rule is not implemented. FEMA also did not include the burden for requests for arbitration or appeals, as the Applicant's ability or decision to file an appeal or request arbitration would not be impacted by this proposed rule.

7.4.1 Applicant Paperwork Costs

The baseline Applicant time burden and costs include the opportunity costs of time to request a major disaster declaration and the opportunity costs of time to complete the forms necessary to facilitate the provision of assistance under the PA program. FEMA estimated the baseline Applicant burden for completing a request for a major disaster declaration from the existing COI number 1660-0009. When an incident occurs in a State or Tribal territory, the Governor or Tribal Chief Executive may request that the President declare a major disaster. FEMA estimated in COI number 1660-0009 that there are 6 major disaster declaration requests per year for each State, and an average of 20 disaster declaration requests per year from Tribal governments that do not submit their request through the State. Therefore, there are 356 disaster declaration requests per year ($6 \text{ requests per State} \times 56 \text{ States} + 20 \text{ Tribal requests} = 356$). FEMA estimated the baseline to be an average of 356 disaster declaration requests per year. This estimate includes requests for both emergencies and major disasters. The estimate also includes requests for major disaster declarations authorizing PA, IA, and both PA and IA and is therefore likely to be overestimated. FEMA did not have enough information at the time of this analysis to separate out only those major disaster declaration requests that authorized PA. This estimate also includes disaster requests that were declared and disaster requests that were denied. Therefore, FEMA used 356 disaster requests per year to estimate the baseline burden.

Each disaster declaration request requires the Applicant to complete FEMA Form 010-0-13, Request for Presidential Disaster Declaration Major Disaster or Emergency. FEMA estimated that it takes the equivalent of a State Government Chief Executive 9 hours to complete the FEMA Form 010-0-13. FEMA obtained the wage rate of \$60.46 for a State Government Chief Executive from BLS Occupational Employment Statistics (OES) data.³³ FEMA accounts for worker benefits when estimating the opportunity cost of time by calculating a benefits-to-wage multiplier using the Department of Labor, BLS report detailing the average employer costs for employee compensation for all civilian workers in major occupational groups and industries.

in the Supporting Statement Part A at https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202006-1660-006. The most recently approved ICR at the time of this analysis was ICR Reference Number 202006-1660-006.

³³ Bureau of Labor Statistics, U.S. Department of Labor, "Occupational Employment Statistics, May 2018," NAICS 999200 (State Government), Standard Occupational Code (SOC) 11-1011 for Chief Executives, mean wage. Archived BLS OES can be found at <https://www.bls.gov/oes/tables.htm>, May 2018, All data (XLS). Mean wage (h_mean) can be found by filtering by NAICS code 999200 and SOC 11-1011.

FEMA estimates that the benefits-to-wage multiplier is 1.46.³⁴ FEMA estimated a loaded wage of \$88.27 by multiplying the base wage rate of \$60.46 by a multiplier of 1.46. With an average of 356 disaster declaration requests per year, the opportunity costs of time to complete FEMA Form 010-0-13 is \$282,817 (9 hours x \$88.27 per hour x 356 requests).

In addition, in the existing COI 1660-0009 FEMA assumed it takes a State Administrative Support Worker (or some other similar occupation) 24.126 hours to gather the necessary information for the request. The baseline burden hours are 8,589 hours per year (356 requests x 24.126 hours). FEMA used a base wage rate of \$27.89 for State Government First Line Supervisors of Office and Administrative Support Workers from BLS OES data.³⁵ Multiplying the \$27.89 base wage rate by a benefits-to-wage multiplier of 1.46, FEMA calculated a total wage rate of \$40.72. The opportunity costs of time to gather the data to request a disaster declaration is \$349,744 (8,589 hours x \$40.72 per hour). The total opportunity costs of time to gather data and to complete FEMA Form 010-0-13 is \$632,561 per year (Table 7-7).

Table 7-7 Baseline Applicant Cost for Requesting a Disaster

Form Name / Form Number	Total Responses	Average Hourly Burden per Response	Total Hourly Annual Burden	Average Hourly Wage Rate	Total Annual Applicant Cost
Request for Presidential Disaster Declaration Major Disaster or Emergency / FEMA Form 010-0-13	356	9	3,204	\$88.27	\$282,817
Initial Data Gathering for Governor's Request / No Form	356	24.126	8,589	\$40.72	\$349,744
Total			11,793		\$632,561
Note: Totals were rounded to the nearest hour and dollar.					

For a PA disaster, Applicants must provide FEMA information that is required for PA program eligibility determinations, grants management, and compliance with other Federal laws and regulations. The baseline Applicant paperwork burden includes the time and cost to complete a request for PA and the forms to determine PA program eligibility. FEMA estimated this

³⁴ The benefits-to-wage multiplier is calculated as follows: (Total Employee Compensation per hour) / (Wages and Salaries per hour). See Economic News Release, U.S. Dep't of Labor, Bureau of Labor Statistics, Table 1. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group (December 2018), available at https://www.bls.gov/news.release/archives/eccec_03192019.pdf. The ECEC measures the average cost to employers for wages and salaries and benefits per employee hour worked. The loaded wage factor is equal to the total compensation of \$36.32 divided by the wages and salary of \$24.91. Values for the total compensation and wages and salary are for civilian workers in the all workers occupational group.

³⁵ Bureau of Labor Statistics, U.S. Department of Labor, "Occupational Employment Statistics, May 2018," NAICS code 999200 (State Government), SOC 43-1011 for First-Line Supervisors of Office and Administrative Support Workers, mean wage. Archived BLS OES can be found at <https://www.bls.gov/oes/tables.htm>, May 2018, All data (XLS). Mean wage (h_mean) can be found by filtering by NAICS code 999200 and SOC 43-1011.

burden using COI number 1660-0017 and found an average of 56 PA disasters per year.³⁶ FEMA assumed there is one Applicant for each disaster, therefore the average number of Applicants per year is 56. While this estimate varies from the baseline average of 59 disasters per year found from 2008-2017, FEMA used the average of 56 for the baseline Applicant paperwork burden to maintain consistency with COI number 1660-0017. FEMA did this to estimate only the impacts from the proposed rule to the current estimated burden.

For each PA disaster, each Applicant that requests PA must complete FEMA Form 009-0-49, Request for PA. This form identifies the Applicant and starts the PA grant process. The Applicant must then submit a project worksheet (PW) for each project (FEMA Forms 009-0-91, 009-0-91A, 009-0-91B, 009-0-91C, and 009-0-91D). The PW identifies the eligible scope of work and includes a quantitative estimate for the eligible work. As a supplement to the PW, the Applicant must also complete FEMA Form 009-0-120, Special Considerations Questions form and FEMA Form 009-0-128 Applicant's Benefits Calculation Worksheet. The Applicant records factors that could affect the scope of work and funding for a project in The Special Considerations Questions. The Applicant records fringe benefits in the Applicant's Benefits Calculation Worksheet.

The Applicant may be required to fill out the following supplemental forms:

- FEMA Form 009-0-121, PNP Facility Questionnaire is used to determine a private non-profit (PNP) Applicant's eligibility.
- FEMA Form 009-0-123, Force Account Labor Summary Record is used to record costs associated with conducting eligible work by an Applicant's own employees.
- FEMA Form 009-0-124, Materials Summary Record is used to record the costs associated with supplies and materials that were purchased or taken from an Applicant's stock and used during the performance of eligible work.
- FEMA Form 009-0-125, Rented Equipment Summary Record is used to record the costs of rented or leased equipment.
- FEMA Form 009-0-126, Contract Work Summary Record is used to record the costs or work that an Applicant has done by contract.
- FEMA Form 009-0-127, Force Account Equipment Summary Record is used to record Applicant equipment costs.
- In addition, FEMA Form 009-0-141, FAC-TRAX System, can be used in place of FEMA Form 009-0-49, Request for Public Assistance and FEMA Form 009-0-91A, Project Worksheet Damage Description and Scope of Work Continuation Sheet. FAC-TRAX collects the same data in a web app format in place of the standard forms.

The number of responses and the average hourly burden varies by each form. Table 7-8 shows the responses per Applicant and the average hourly burden for each form, as estimated in COI number 1660-0017.

³⁶ FEMA assumed in COI 1660-0017 that on average, there would be 1 PA disaster per State per year, for a total of 56 PA disasters. The number of respondents for 1660-0017 differs from 1660-0009 because 1660-0009 is for both disaster and emergency requests, and includes requests for assistance from the IA program, for the PA program, tribal government requests, and requests that were denied.

Table 7-8 Baseline Applicant Cost for Request for PA and PA Program Eligibility

Form Name / Form Number	Number of Applicants (A)	Responses per Applicant (B)	Total Responses (A*B)	Average Hourly Burden per Response (C)	Total Hourly Annual Burden (A*B*C)	Average Hourly Wage Rate (D)	Total Annual Applicant Cost (A*B*C*D)
FEMA Form 009-0-49, Request for Public Assistance	56	129	7,224	0.25	1,806	\$63.69	\$115,024
FEMA Form 009-0-91, Project Worksheet (PW) and a Request for Time Extension	56	840	47,040	1.5	70,560	\$63.69	\$4,493,966
FEMA Form 009-0-91A Project Work Sheet (PW) Damage Description and Scope of Work	56	784	43,904	1.5	65,856	\$63.69	\$4,194,369
FEMA Form 009-0-91B, Project Worksheet (PW) Cost Estimate Continuation Sheet and Request for additional funding for Cost Overruns	56	784	43,904	1.333	58,524	\$63.69	\$3,727,396
FEMA Form 009-0-91C Project Worksheet (PW) Maps and Sketches Sheet	56	728	40,768	1.5	61,152	\$63.69	\$3,894,771

Form Name / Form Number	Number of Applicants (A)	Responses per Applicant (B)	Total Responses (A*B)	Average Hourly Burden per Response (C)	Total Hourly Annual Burden (A*B*C)	Average Hourly Wage Rate (D)	Total Annual Applicant Cost (A*B*C*D)
FEMA Form 009-0-91D Project Worksheet (PW) Photo Sheet	56	728	40,768	1.5	61,152	\$63.69	\$3,894,771
FEMA Form 009-0-120, Special Considerations Questions	56	840	47,040	0.5	23,520	\$63.69	\$1,497,989
FEMA Form 009-0-128, Applicant's Benefits Calculation Worksheet	56	784	43,904	0.5	21,952	\$63.69	\$1,398,123
FEMA Form 009-0-121, PNP Facility Questionnaire	56	94	5,264	0.5	2,632	\$63.69	\$167,632
FEMA Form 009-0-123, Force Account Labor Summary Record	56	94	5,264	0.5	2,632	\$63.69	\$167,632
FEMA Form 009-0-124, Materials Summary Record	56	94	5,264	0.25	1,316	\$63.69	\$83,816
FEMA Form 009-0-125, Rented Equipment Summary Record	56	94	5,264	0.5	2,632	\$63.69	\$167,632
FEMA Form 009-0-126, Contract Work Summary Record	56	94	5,264	0.5	2,632	\$63.69	\$167,632

Form Name / Form Number	Number of Applicants (A)	Responses per Applicant (B)	Total Responses (A*B)	Average Hourly Burden per Response (C)	Total Hourly Annual Burden (A*B*C)	Average Hourly Wage Rate (D)	Total Annual Applicant Cost (A*B*C*D)
FEMA Form 009-0-127, Force Account Equipment Summary Record	56	94	5,264	0.25	1,316	\$63.69	\$83,816
FEMA Form 009-0-141, FAC-TRAX System	56	913	51,128	1.25	63,910	\$63.69	\$4,070,428
Total			397,264		441,592		\$28,124,997
Note: Totals were rounded to the nearest hour and dollar.							

FEMA assumed in the existing COI 1660-0017 that the equivalent of a managerial position in State government prepares each of the forms listed in Table 7-6. FEMA obtained the wage rate of \$43.62 for State Government Management Occupation from BLS OES data.³⁷ To account for employee benefits, FEMA used the previously established benefits-to-wage multiplier of 1.46. Multiplying the \$43.62 wage rate by the load factor of 1.46, FEMA found a loaded wage rate of \$63.69. FEMA multiplied the loaded wage rate by the total hourly annual burden for each form to find the total opportunity costs of time per form. Summing these burdens, FEMA found the baseline Applicant cost to complete a request for PA and the forms to determine PA program eligibility is \$28,194,997.

FEMA added the total opportunity costs of time for completing the FEMA Form 010-0-13 to request a disaster declaration (11,793 hours) to the total opportunity costs of time to request PA and complete forms for PA program eligibility (441,592 hours, Table 7-8) to find the total baseline paperwork burden for Applicants of 453,385 hours per year. The total cost of the baseline paperwork burden for Applicants is \$28,757,558 per year (\$632,561 for FEMA Form 010-0-13 from Table 7-5 added to the \$28,124,997 for request for PA and subsequent PA forms).

7.4.2 FEMA Paperwork Cost

The baseline paperwork costs for FEMA include the time to review requests for a disaster declaration and the time to review the requests for PA and the forms submitted for PA program eligibility.

³⁷ BLS OES, May 2018, NAICS code 999200, State Government, excluding schools and hospitals, SOC 11-0000 for Management Occupations, mean wage. Archived BLS OES can be found at <https://www.bls.gov/oes/tables.htm>, May 2018, All data (XLS). Mean wage (h_mean) can be found by filtering by NAICS code 999200 and SOC 11-0000.

FEMA reviews each of the requests for a disaster declaration. The baseline time burden and costs for reviewing a request for a disaster declaration are taken from COI number 1660-0009. FEMA estimated in COI number 1660-0009 that it takes 48 hours for a FEMA employee to review each request for a disaster declaration (FEMA Form 010-0-13). FEMA estimated the wage rate for this review is done by personnel analogous to a government employee at the grade level of a General Schedule (GS) 15, Step 5 level. The base hourly wage rate for a GS-15, Step 5 government employee is \$73.20.³⁸ Using a multiplier of 1.46 as previously established, FEMA estimated the loaded hourly wage of \$106.87 for a GS-15, Step 5 FEMA employee (base hourly wage rate of \$73.20 x 1.46). FEMA estimated the baseline cost to review requests for disaster declarations is \$1,826,195 (356 requests x 48 hours x \$106.87 wage rate).

FEMA reviews the forms in Table 7-8 to make determinations for PA grants based on the information supplied by Applicants. The baseline time burden and cost for FEMA to review the forms submitted for PA program eligibility are taken from existing COI number 1660-0017. FEMA estimated that 12 FEMA employees spend approximately 50 percent of their time annually reviewing requests for PA and the Applicant information for PA program eligibility.³⁹ FEMA estimated the wage rate for this review is done by personnel analogous to a government employee at the grade level of GS 12, Step 5 level. The annual salary for a GS-12, Step 5 government employee is \$92,421.⁴⁰ FEMA uses an annual salary to estimate the government burden in COI number 1660-0017 because the review for these items takes up a significant portion of the employees' workload throughout the entire year. Rather than estimate the hours, FEMA uses the proportion of the yearly workload and applies it to the annual salary. To account for employee benefits, FEMA used the same multiplier of 1.46 to estimate the full employment cost of a GS-12, Step 5 government employee as \$134,935 (\$92,421 x 1.46). FEMA estimated the per unit cost to review the requests for PA and the forms for PA program eligibility as \$809,610 (\$134,935 fully loaded salary x 12 employees x 50 percent of their time).

The total cost of reviewing disaster declaration requests and PA and PA program eligibility form requests is \$2,635,805 (\$1,826,195 + \$809,610).

7.5 Baseline Summary

³⁸ The GS-15, Step 5 hourly wage of \$73.20 is taken from the Office of Personnel Management (OPM) Salary Table 2018-DCB, for the locality pay area of Washington-Baltimore-Northern Virginia, Effective January 2018, found at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB_h.pdf. FEMA assumes the reviews are completed by FEMA employees at the FEMA headquarters in Washington, DC.

³⁹ "Public Assistance Program", OMB Control Number 1660-0017 can be found in the Supporting Statement Part A found at https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202003-1660-001. The most recently approved ICR at the time of this analysis was ICR Reference Number 202003-1660-001.

⁴⁰ Reviews are conducted by staff at the GS11-13 level. FEMA uses GS12 Step 5 as the midpoint. The GS-12, Step 5 annual salary is taken from the OPM Salary Table 2018 for the locality pay area of Washington-Baltimore-Northern Virginia, Effective January 2018, found at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB.pdf>. FEMA assumes the reviews are completed by FEMA employees at the FEMA headquarters in Washington, DC.

Table 7-9 summarizes the baseline transfers to Applicants from FEMA and the costs to Applicants and FEMA. Because these costs have already been incurred, they are not costs of the proposed rule.

Table 7-9 Baseline Summary

Transfer or Cost Item	Average Annual
Funding Transfers to Applicants from FEMA	
PA Funding	\$4,904,608,826
HMGP Funding	\$699,748,555
BRIC Funding	\$220,378,833
PA Management Cost Funding	\$588,553,059
HMGP Management Cost Funding	\$104,962,283
BRIC Management Cost Funding	\$38,890,382
Total Funding Transfers to Applicants	\$6,557,141,938
Costs	
Applicant Paperwork Cost	\$28,757,558
FEMA Administrative Cost	\$1,679,333,809
FEMA Paperwork Cost	\$2,635,805
<i>Total FEMA Cost</i>	<i>\$1,681,969,614</i>
Total Cost (Applicants and FEMA)	\$1,710,727,172

8. FUNDING AND COSTS AFTER IMPLEMENTATION OF PROPOSED RULE

FEMA estimated the funding transfers to Applicants and the costs that would have occurred from 2008-2017 given implementation of the changes in the proposed rule. FEMA reviewed the baseline PA disasters and identified the PA disasters that would have still been declared with the proposed changes, and the funding transfers and costs associated with these PA disasters.

8.1 Disasters After Implementation of Proposed Rule

FEMA does not recommend to the President to declare a major disaster authorizing the PA program unless the estimated eligible damages exceed the minimum threshold – currently \$1 million which FEMA proposes in this rulemaking to raise to \$1.535 million. Using the total amount that FEMA recorded as spent on PA for each PA disaster between 2008-2017, FEMA

determined which of these PA disasters would not have exceeded the proposed minimum threshold.⁴¹

For each PA disaster in the baseline, FEMA compared the project amount to the proposed \$1.535 million-dollar threshold. FEMA assumed that a PA disaster that did not exceed the proposed minimum threshold would not have been declared under the proposed rule. FEMA found there were 13 PA disasters from 2008-2017 that would not have exceeded the proposed minimum threshold under the proposed rule, an average of 1 per year (Table 8-1).

If a PA disaster project amount exceeded the minimum threshold, then FEMA would continue to apply the factors in 44 CFR 206.48 to determine whether to recommend the President declare a major disaster authorizing the PA Program. After removing the PA disasters that did not exceed \$1.535 million proposed minimum threshold, FEMA identified which PA disasters would not have exceeded the proposed State COA indicator by calculating what the State COA indicator would have been for each State for the years 2008-2017. Appendix A shows the following steps and the resulting State COA indicator for the year 2018. FEMA followed the same steps for each year and the corresponding data for that year. FEMA first calculated each State's adjusted per capita indicator (proposed COA indicator) for each year. FEMA multiplied the TTR per capita index for each State and years 2008-2017 by the base per capita indicator of \$2.32 and then divided by 100 to create an adjustment relative to the US' TTR of 100 (see Appendix B). FEMA adjusted the base per capita indicator of \$2.32 by the individual States' TTR for the years 2008-2017 using the latest TTR per capita index data that would have been available at that time. The Department of the Treasury publishes TTR data in September each year. For example, the 2014 TTR estimates published on September 18, 2014. This would have been the latest available TTR data when FEMA published the per capita indicators for FY2015.⁴² Therefore, for FY 2015 FEMA adjusted the \$2.32 base per capita indicator by the 2014 TTR per capita index data. FEMA did this for each year and each State from 2008-2017. Using the same example, the TTR per capita index for Alabama published in 2014 was 76.8. FEMA multiplied this by \$2.32 and divided by 100 to get an adjusted per capita indicator of \$1.77 for Alabama in FY2015. Since the Department of the Treasury does not publish TTR for the territories, FEMA proposed to not adjust the per capita indicator for TTR for DC⁴³ or the territories and FEMA used the base per capita indicator of \$2.32 for these for each year. FEMA requests public comments on alternative TTR measures for DC and the territories.

FEMA then multiplied each State's TTR adjusted per capita indicator per year by the State's annual population to determine the proposed State COA indicator. FEMA used population

⁴¹ FEMA uses actual project amounts due to data limitations that prevent the use of PDA figures, discussed in Section 5 of this RIA, Methodology and Assumptions.

⁴² There is a 2-year lag on TTR data. While the 2014 TTR estimates were available on September 18, 2014, the TTR values reported were based on 2012 data.

⁴³ FEMA proposes not to adjust the District of Columbia's per capita indicator for TTR. The complex tax and Federal appropriation circumstances in the District of Columbia, as well as Congress' control over the ability of the District to manipulate its own revenues, would require impractical and potentially inaccurate adjustments in the TTR method. For example, Federal law prohibits the District from taxing non-resident commuters.

data from the Census Bureau's PEP.⁴⁴ For each year, FEMA used the PEP population data that would have been the most recently available estimates for that year. The PEP population estimates are published in September each year. For example, the 2014 PEP population estimates published in September 2014. FEMA assumed these would have been the most recent estimates available when FEMA published the per capita indicators for FY2015. FEMA multiplied the TTR adjusted per capita indicator for each State by the State's population to find the proposed State COA indicator. Using the same example, the PEP population estimate for Alabama published in September 2014 was 4,849,377.⁴⁵ FEMA multiplied this by the adjusted per capita indicator of \$1.77 to find an Alabama State COA indicator of \$8,583,397 for FY2015.

FEMA then compared the project amounts of the PA disasters, adjusted to 2018\$, to the proposed minimum threshold and the proposed State COA indicator for each year. If the project amount was less than the proposed minimum threshold and proposed State COA indicator, FEMA assumed the PA disaster would not have been declared under the proposed rule and the PA disaster was removed. FEMA found there were a total of 159 PA disasters from 2008-2017 that had project amounts that would not have exceeded the minimum threshold and State COA indicator if the proposed rule was in effect. Table 8-1 shows the baseline PA disasters, the PA disasters that would not have exceeded the minimum threshold, the PA disasters that would not have exceeded the State COA indicator, and the PA disasters that would have exceeded both. Averages were rounded to the nearest whole number, as there cannot be a partial disaster.

⁴⁴ Annual Estimates of the Resident Population for the United States, Regions, States, and Puerto Rico, found at <https://www.census.gov/data/tables/time-series/demo/popest/2010s-state-total.html>. Excel file "Searchable Index and File Descriptions for All Files on the FTP2 Site" contains links to historical PEP estimates. PEP estimates are revised annually and published in September; therefore, FEMA pulled the population data from each vintage year. For example, 2011 population estimates were pulled from the vintage 2011 data set titled "nst_est2011_alldata". 2011 PEP estimates would have been available in September 2011 for the FY2012 State threshold calculation. PEP estimates are not published in census years (2010).

⁴⁵ Excel sheet titled "nst-est2014-popchg2010_2014" can be downloaded at https://www2.census.gov/programs-surveys/popest/datasets/2010-2014/national/totals/nst-est2014-popchg2010_2014.csv.

Table 8-1 PA Disasters that did not Exceed Proposed Minimum Threshold and State COA Indicator

Year	Baseline Number of Disasters	Disasters Below Proposed Minimum Threshold	Disasters Below Proposed State COA Indicator	Total Disasters Below Proposed Minimum Threshold and Proposed State COA Indicator	Disasters that Exceeded Proposed Minimum Threshold and State COA Indicator
2008	61	2	13	15	46
2009	62	2	16	18	44
2010	79	2	17	19	60
2011	97	1	29	30	67
2012	42	2	10	12	30
2013	60	1	17	18	42
2014	46	2	14	16	30
2015	42	1	8	9	33
2016	41	0	10	10	31
2017	55	0	12	12	43
Total	585	13	146	159*	426
Average	59	1	15	16	43

* Disasters below the minimum threshold and proposed COA indicator can be found in Appendix C

FEMA found that an average of 16 PA disasters per year would not have exceeded the proposed minimum threshold and State COA indicator. This represents a 27 percent reduction in the annual PA disaster declarations (159 removed PA disasters / 585 total PA disasters). FEMA recognizes that the minimum threshold and COA factors are not the only factors FEMA considers when recommending a PA disaster declaration. For the purposes of this analysis, FEMA assumed these PA disasters would not have been declared based on these factors alone if the proposed rule was in effect. Therefore, these estimates are an upper bound proxy and FEMA recognizes this could overestimate the impacts of this rulemaking, as it is possible that some of these PA disasters could have still been declared even if they did not exceed the proposed minimum threshold and State COA indicator.

8.2 Funding Transfers to Applicants After Implementation of Proposed Rule

The following tables present the funding that would have transferred to Applicants from 2008-2017 after implementation of the proposed regulatory changes. Using the same methodology presented in Section 7, FEMA first removed the 13 PA disasters that did not exceed the minimum threshold and summed the funding for the remaining PA disasters. Table 8-2 presents these results.

Table 8-2 Funding Transfers to Applicants After Removing PA Disasters that did not Exceed the Proposed Minimum Threshold

Fiscal Year	PA Funding	HMGP Funding	BRIC Funding	PA Management Funding	HMGP Management Funding	BRIC Management Funding*
2008	\$6,712,617,555	\$1,132,337,988	\$342,343,495	\$805,514,106	\$169,850,698	\$60,413,558
2009	\$1,968,851,915	\$374,598,807	\$100,411,448	\$236,262,230	\$56,189,821	\$17,719,667
2010	\$1,773,703,087	\$373,549,603	\$90,458,857	\$212,844,370	\$56,032,441	\$15,963,328
2011	\$4,054,692,638	\$512,979,525	\$206,789,324	\$486,563,117	\$76,946,929	\$36,492,234
2012	\$1,060,812,289	\$117,422,826	\$62,864,415	\$127,297,474	\$17,613,424	\$11,093,720
2013	\$19,027,031,236	\$1,723,102,702	\$520,368,944	\$2,283,243,748	\$258,465,405	\$91,829,814
2014	\$1,140,965,966	\$215,180,867	\$63,865,311	\$136,915,916	\$32,277,130	\$11,270,349
2015	\$1,149,071,491	\$215,882,696	\$65,159,310	\$137,888,579	\$32,382,405	\$11,498,702
2016	\$1,920,589,054	\$353,114,959	\$183,996,529	\$230,470,687	\$52,967,244	\$32,469,976
2017	\$10,227,423,904	\$1,967,720,901	\$567,011,265	\$1,227,290,868	\$295,158,135	\$100,060,811
Total	\$49,035,759,135	\$6,985,890,874	\$2,203,268,899	\$5,884,291,095	\$1,047,883,632	\$388,812,159
Average	\$4,903,575,914	\$698,589,087	\$220,326,890	\$588,429,110	\$104,788,363	\$38,881,216
* FEMA was able to estimate BRIC amounts for 2012-2017 based on historical PA data. FEMA did not have 6-month disaster estimate data available to estimate BRIC allocations for 2008-2011, so FEMA used 6 percent of total PA funding per fiscal year for 2008-2011....						

FEMA then removed the 146 PA disasters that exceeded the proposed minimum threshold but would not have exceeded the proposed State COA indicator. FEMA summed the funding for the remaining 426 PA disasters after removing the 159 PA disasters from the baseline that did not the exceed the proposed minimum threshold and State COA indicator. Table 8-3 presents the summary of the funding FEMA would have transferred to the Applicants for PA disasters from 2008-2017 after implementation of the proposed rule.

Table 8-3 Funding Transfers to Applicants from FEMA After Implementation of Proposed Rule

Fiscal Year	PA Funding	HMGP Funding	BRIC Funding*	PA Management Funding	HMGP Management Funding	BRIC Management Funding*
2008	\$6,658,359,994	\$1,119,514,631	\$339,576,360	\$799,003,199	\$167,927,195	\$59,925,240
2009	\$1,802,468,783	\$343,357,073	\$91,925,908	\$216,296,254	\$51,503,561	\$16,222,219
2010	\$1,570,249,116	\$279,477,209	\$80,082,705	\$188,429,893	\$41,921,581	\$14,132,242
2011	\$3,814,066,689	\$465,252,919	\$194,517,401	\$457,688,003	\$69,787,938	\$34,326,600
2012	\$1,014,234,986	\$109,292,232	\$60,010,309	\$121,708,198	\$16,393,835	\$10,590,054
2013	\$18,861,918,689	\$1,700,199,049	\$512,696,476	\$2,263,430,242	\$255,029,857	\$90,475,849
2014	\$980,989,998	\$187,748,153	\$56,466,338	\$117,718,800	\$28,162,223	\$9,964,648

2015	\$1,067,786,918	\$201,568,314	\$60,658,212	\$128,134,430	\$30,235,247	\$10,704,390
2016	\$1,746,420,102	\$316,627,831	\$176,107,422	\$209,570,413	\$47,494,175	\$31,077,781
2017	\$10,084,243,598	\$1,941,146,424	\$559,073,308	\$1,210,109,231	\$291,171,964	\$98,659,996
Total	\$47,600,738,873	\$6,664,183,835	\$2,131,114,438	\$5,712,088,663	\$999,627,575	\$376,079,019
Average	\$4,760,073,887	\$666,418,384	\$213,111,444	\$571,208,866	\$99,962,758	\$37,607,902
* FEMA was able to estimate BRIC amounts for 2012-2017 based on historical PA data. FEMA did not have 6-month disaster estimate data available to estimate BRIC allocations for 2008-2011, so FEMA used 6 percent of total PA funding per fiscal year for 2008-2011.						

8.3 Administrative Costs After Implementation of Proposed Rule

Using the same methodology presented in Section 7, FEMA first removed the 13 PA disasters that did not exceed the minimum threshold and summed the FEMA administrative costs for the remaining PA disasters. Table 8-4 presents these results.

Table 8- 4 Administrative Costs After Removing PA Disasters that did not Exceed the Proposed Minimum Threshold

Fiscal Year	FEMA Administrative Costs
2008	\$2,052,428,129
2009	\$630,092,358
2010	\$669,365,005
2011	\$1,366,144,261
2012	\$338,716,423
2013	\$2,139,517,905
2014	\$396,332,544
2015	\$454,260,584
2016	\$1,204,519,512
2017	\$7,533,327,855
Total	\$16,784,704,576
Average	\$1,678,470,458

FEMA then removed the additional 146 PA disasters that would not have exceeded the State COA indicator. After removing the 159 PA disasters that would not have exceeded the proposed minimum threshold or State COA indicator, FEMA summed the administrative costs for the remaining PA disasters. Table 8-5 presents the FEMA administrative costs after implementation of the proposed regulatory changes over the period of analysis. The total FEMA administrative costs from 2008-2017 would have been \$16.17 billion, an average of \$1.62 billion per year. The FEMA administrative costs would have ranged from a low of \$322.32 million in 2012 to a high of \$7.47 billion in 2017.

Table 8-5 Administrative Costs After Implementation of Proposed Rule

Fiscal Year	Administrative Costs
2008	\$2,004,720,231
2009	\$582,209,344
2010	\$536,868,432
2011	\$1,317,391,731
2012	\$322,324,616
2013	\$2,099,207,823
2014	\$351,716,850
2015	\$433,711,955
2016	\$1,054,351,734
2017	\$7,466,741,567
Total	\$16,169,244,283
Average	\$1,616,924,428

8.4 Paperwork Costs After Implementation of Proposed Rule

FEMA used the same methodology presented in the baseline to estimate the paperwork costs for Applicants and FEMA after implementation of the proposed rule.

8.4.1 Applicant Paperwork Costs After Implementation of Proposed Rule

The Applicant time burden and costs include the opportunity costs of time to request a PA disaster declaration and the opportunity costs of time to complete the forms necessary to facilitate the provision of assistance under the PA program. In the baseline COI number 1660-0009, FEMA estimated there are an average of 356 disaster declaration requests per year. FEMA estimated there would have been an average of 16 fewer PA disasters per year due to the proposed regulatory changes. To estimate the impacts to paperwork costs, FEMA assumed that Applicants would not submit a disaster declaration request if the estimated damages did not exceed the minimum threshold and the State COA indicator. Therefore, there would have been 16 less PA disaster requests per year. FEMA subtracted 16 from the 356 requests to estimate there would be an average of 340 disaster declaration requests per year under the proposed rule. FEMA recognizes it is possible the Applicants could still submit requests even though the damages are below the minimum threshold and the State COA indicator, as the COA factor is not the only factor considered when recommending a disaster declaration. For this analysis, FEMA held all other factors constant and assumed the minimum threshold and the State COA indicator are hard thresholds.

The proposed rule would not change the burden per request or the hourly loaded wage rate. Each disaster declaration request requires the Applicant to complete FEMA Form 010-0-13. FEMA estimated that it takes the equivalent of a State Government Chief Executive 9 hours to

complete FEMA Form 010-0-13. At an hourly loaded wage rate of \$88.27, FEMA estimated the total cost to complete FEMA Form 010-0-13 would be \$270,106 after implementation of the proposed rule (9 hours x \$88.27 wage rate x 340 requests).

In addition, a State Administrative Support Worker would take 24.126 hours to gather the necessary information for the request. The total burden hours would have been 8,203 hours per year (340 requests x 24.126 hours, rounded). At an hourly loaded wage rate of \$40.72, FEMA estimated the total cost to gather the data for a request would be \$334,026 (8,203 hours x \$40.72). Adding the cost to gather data to the cost to complete FEMA Form 010-0-13, Table 8-6 shows the total Applicant cost for completing Form 010-0-13 is \$604,132 per year after implementation of the proposed rule.

Table 8-6 Applicant Cost for Requesting a Disaster After Implementation of the Proposed Rule

Form Name / Form Number	Total Requests	Average Hourly Burden per Request	Total Hourly Annual Burden	Average Hourly Wage Rate	Total Annual Applicant Cost
Request for Presidential Disaster Declaration Major Disaster or Emergency / FEMA Form 010-0-13	340	9	3,060	\$88.27	\$270,106
Initial Data Gathering for Governor's Request / No Form	340	24.126	8,203	\$40.72	\$334,026
Total			11,263		\$604,132
Note: Totals were rounded to the nearest hour and dollar.					

The Applicant paperwork burden includes the time and cost to complete the forms to determine PA program eligibility. FEMA estimated in the baseline COI number 1660-0017 there are an average of 56 PA disasters per year for which Applicants requested PA and completed the forms necessary for PA program eligibility. FEMA assumed there is 1 Applicant for each PA disaster, therefore the average number of Applicants per year is 56. FEMA estimated there would have been an average of 16 less PA disasters per year due to the proposed regulatory changes. FEMA subtracted 16 from the 56 Applicants to estimate there would be an average of 40 Applicants per year after implementation of the proposed regulation.

For each PA disaster, each Applicant that requests PA must complete FEMA Form 009-0-49, Request for PA. The Applicants would also complete the same project worksheets and forms as described in the baseline paperwork cost section of this RIA. The hourly burden per response and the hourly wage rate would not change after implementation of the proposed rule. FEMA multiplied the loaded wage rate of \$63.69 by the total hourly annual burden for each form to find the total burden per form. Summing these burdens, FEMA found the total annual burden to complete a request for PA and the forms to determine PA program eligibility under the proposed rule would be \$18,254,319 (Table 8-5).

Table 8-7 Applicant Burden After Implementation of Proposed Rule for Request for PA and PA Program Eligibility

Form Name / Form Number	Number of Applicants (A)	Responses per Applicant (B)	Total Responses (A*B)	Average Hourly Burden per Response (C)	Total Hourly Annual Burden (A*B*C)	Average Hourly Wage Rate (D)	Total Annual Applicant Cost (A*B*C*D)
FEMA Form 009-0-49, Request for Public Assistance	40	129	5,160	0.25	1,290	\$63.69	\$82,160
FEMA Form 009-0-91, Project Worksheet (PW) and a Request for Time Extension	40	840	33,600	1.5	50,400	\$63.69	\$3,209,976
FEMA Form 009-0-91A Project Work Sheet (PW) Damage Description and Scope of Work	40	784	31,360	1.5	47,040	\$63.69	\$2,995,978
FEMA Form 009-0-91B, Project Worksheet (PW) Cost Estimate Continuation Sheet and Request for additional funding for Cost Overruns	40	784	31,360	1.333	41,843	\$63.69	\$2,662,425
FEMA Form 009-0-91C Project Worksheet (PW) Maps and Sketches Sheet	40	728	29,120	1.5	43,680	\$63.69	\$2,781,979
FEMA Form 009-0-91D Project Worksheet (PW) Photo Sheet	40	728	29,120	1.5	43,680	\$63.69	\$2,781,979
FEMA Form 009-0-120, Special Considerations Questions	40	840	33,600	0.5	16,800	\$63.69	\$1,069,992

FEMA Form 009-0-128, Applicant's Benefits Calculation Worksheet /	40	784	31,360	0.5	15,680	\$63.69	\$998,659
FEMA Form 009-0-121, PNP Facility Questionnaire	40	94	3,760	0.5	1,880	\$63.69	\$119,737
FEMA Form 009-0-123, Force Account Labor Summary Record	40	94	3,760	0.5	1,880	\$63.69	\$119,737
FEMA Form 009-0-124, Materials Summary Record	40	94	3,760	0.25	940	\$63.69	\$59,869
FEMA Form 009-0-125, Rented Equipment Summary Record	40	94	3,760	0.5	1,880	\$63.69	\$119,737
FEMA Form 009-0-126, Contract Work Summary Record	40	94	3,760	0.5	1,880	\$63.69	\$119,737
FEMA Form 009-0-127, Force Account Equipment Summary Record	40	94	3,760	0.25	940	\$63.69	\$59,869
FEMA Form 009-0-141, FAC-TRAX System	40	913	36,520	1.25	45,650	\$63.69	\$2,907,449
Total			283,760		315,423		\$20,089,283
Note: Totals were rounded to the nearest hour and dollar.							

FEMA added the total burden for completing the FEMA Form 010-0-13 to request a disaster declaration to the total burden to request PA and complete forms for PA program eligibility to find the total paperwork burden for Applicants after implementation of the proposed rule. The total paperwork burden for Applicants would be 315,423 hours per year, a cost of \$20,089,283 per year.

8.4.2 FEMA Paperwork Costs After Implementation of Proposed Rule

The paperwork costs for FEMA include the time to review requests for a disaster declaration and the time to review requests for PA and the forms submitted for PA program eligibility. The proposed regulation would not change the burden per request or the hourly loaded wage rate. FEMA estimated in COI number 1660-0009 that it takes 48 hours for a GS-15, Step 5 FEMA employee to review each request for a disaster declaration. Using the same wage rate of

\$106.87, FEMA estimated the cost for FEMA to review disaster declarations under the proposed rule would be \$1,744,118 per year (340 requests x 48 hours x \$106.87 wage rate).

FEMA would review the forms in Table 8-7 to make determinations for PA grants based on the information supplied by Applicants. FEMA estimated in COI number 1660-0017 that 12 FEMA employees spend approximately 50 percent of their time reviewing requests for PA and the Applicant information for PA program eligibility. FEMA estimated the PA disasters would have been reduced by 27 percent after implementation of the proposed rule. To account for this, FEMA estimated the 12 FEMA employees would have spent 36.5 percent of their time annually reviewing Applicant information $[50\% - (50\% * 27\%)]$. FEMA estimated the total annual cost to review the requests for PA and the forms for PA program eligibility would be \$591,015 (\$134,935 fully loaded salary x 12 employees x 36.5% of their time).

Adding the cost of reviewing disaster declaration requests to the cost to review requests for PA and PA program eligibility forms, FEMA estimated the annual cost to FEMA under the proposed rule would be \$2,335,133.

8.5 Summary of Funding and Costs After Implementation of Proposed Rule

Table 8-8 presents the summary of the annual average funding transfers to Applicants and the costs to Applicants and FEMA that would have occurred from 2008 through 2017 after implementation of the proposed rule.

Table 8-8 Summary of Funding Transfers and Costs After Implementation of Proposed Rule

Transfer or Cost Item	Average Annual
Funding Transfers to Applicants from FEMA	
PA Funding	\$4,760,073,887
HMGP Funding	\$666,418,384
BRIC Funding	\$213,111,444
PA Management Cost Funding	\$571,208,866
HMGP Management Cost Funding	\$99,962,758
BRIC Management Cost Funding	\$37,607,902
Total Funding Transfers to Applicants	\$6,348,383,241
Costs	
Applicant Paperwork Cost	\$20,089,283
FEMA Administrative Cost	\$1,616,924,428
FEMA Paperwork Cost	\$2,335,133
<i>Total FEMA Cost</i>	\$1,619,259,561
Total Cost	\$1,639,348,844

9. REDUCTION IN TRANSFERS RESULTING FROM THE PROPOSED RULE

Transfer payments are monetary payments from one group to another that do not affect the total resources available to society. Transfers such as insurance payments, direct subsidies, and indirect subsidies can have significant efficiency effects in addition to distributional effects and are not included in the estimates of the benefits and costs of a regulation. The reduction in PA disasters would result in less funding provided to the Applicants. Implementation of the proposed rule would result in a reduction of transfer payments to the Applicants from FEMA. To estimate the reduction in transfers, FEMA subtracted the funding transfers after implementation of the proposed rule (Table 8-3) from the baseline funding transfers to Applicants (Table 7-2). FEMA estimates that from 2008-2017, the proposed rulemaking would have resulted in a total reduction of \$2.09 billion in transfers to Applicants from FEMA, an average of \$208.76 million per year. Table 9-1 summarizes the total reduction in transfers by each type of funding.

Table 9-1 Reduction in Transfers to Applicants

Fiscal Year	PA Funding	HMGP Funding	BRIC Funding	PA Management Funding	HMGP Management Funding	BRIC Management Funding*	Total
2008	\$55,349,632	\$12,986,121	\$2,822,831	\$6,641,956	\$1,947,918	\$498,147	\$80,246,605
2009	\$168,183,384	\$31,897,556	\$8,577,353	\$20,182,006	\$4,784,633	\$1,513,651	\$235,138,583
2010	\$205,234,001	\$104,069,817	\$10,466,934	\$24,628,081	\$15,610,473	\$1,847,106	\$361,856,412
2011	\$241,289,532	\$47,798,441	\$12,305,766	\$28,954,744	\$7,169,766	\$2,171,606	\$339,689,855
2012	\$48,744,041	\$8,401,645	\$2,954,926	\$5,849,285	\$1,260,247	\$521,458	\$67,731,602
2013	\$165,299,427	\$22,927,425	\$7,682,725	\$19,835,932	\$3,439,114	\$1,355,775	\$220,540,398
2014	\$161,318,138	\$27,617,826	\$7,465,666	\$19,358,176	\$4,142,674	\$1,317,470	\$221,219,950
2015	\$82,581,977	\$14,541,278	\$4,570,627	\$9,909,837	\$2,181,192	\$806,582	\$114,591,493
2016	\$174,168,952	\$36,487,128	\$7,889,108	\$20,900,274	\$5,473,069	\$1,392,195	\$246,310,726
2017	\$143,180,306	\$26,574,477	\$7,937,956	\$17,181,637	\$3,986,171	\$1,400,815	\$200,261,362
Total	\$1,445,349,390	\$333,301,714	\$72,673,892	\$173,441,928	\$49,995,257	\$12,824,805	\$2,087,586,986
Average	\$144,534,939	\$33,330,171	\$7,267,390	\$17,344,193	\$4,999,526	\$1,282,481	\$208,758,700

* FEMA was able to estimate BRIC amounts for 2012-2017 based on historical PA data. FEMA did not have data available to estimate BRIC allocations for 2008-2011, so FEMA used 6 percent of total PA funding per fiscal year for 2008-2011.

FEMA also broke out the reduction in transfers to Applicants presented in Table 9-1 by those reductions in transfers due to the proposed minimum threshold and due to the proposed State COA indicator. The proposed minimum threshold would have resulted in a reduction of \$25.56 million in transfers to Applicants from FEMA, an average of \$2.56 million per year (Table 9-2). The proposed State COA indicator would have resulted in a reduction of \$2.06 billion in transfers to Applicants, and average of \$206.29 million per year (Table 9-3).

Table 9-2 Reduction in Transfers to Applicants due to Proposed Minimum Threshold

Fiscal Year	PA Funding	HMGP Funding	BRIC Funding*	PA Management Funding	HMGP Management Funding	BRIC Management Funding*	Total
2008	\$1,092,071	\$162,764	\$55,696	\$131,049	\$24,415	\$9,829	\$1,485,653
2009	\$1,800,252	\$655,822	\$91,813	\$216,030	\$98,373	\$16,203	\$2,894,695
2010	\$1,780,030	\$9,997,423	\$90,782	\$213,604	\$1,499,613	\$16,020	\$13,613,492
2011	\$663,583	\$71,835	\$33,843	\$79,630	\$10,775	\$5,972	\$871,610
2012	\$2,166,738	\$271,051	\$100,820	\$260,009	\$40,658	\$17,792	\$2,874,860
2013	\$186,880	\$23,772	\$10,257	\$22,426	\$3,566	\$1,810	\$250,521
2014	\$1,342,170	\$185,112	\$66,693	\$161,060	\$27,767	\$11,769	\$1,806,340
2015	\$1,297,404	\$226,896	\$69,528	\$155,688	\$34,034	\$12,270	\$1,808,090
2016	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2017	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total	\$10,329,128	\$11,594,675	\$519,432	\$1,239,496	\$1,739,201	\$91,665	\$25,605,261
Average	\$1,032,913	\$1,159,468	\$51,944	\$123,950	\$173,920	\$16,666	\$2,560,526

* FEMA was able to estimate BRIC amounts for 2012-2017 based on historical PA data. FEMA did not have data available to estimate BRIC allocations for 2008-2011, so FEMA used 6 percent of total PA funding per fiscal year for 2008-2011.

Table 9-3 Reduction in Transfers to Applicants due to Proposed State COA Indicator

Fiscal Year	PA Funding	HMGP Funding	BRIC Funding*	PA Management Funding	HMGP Management Funding	BRIC Management Funding*	Total
2008	\$54,257,561	\$12,823,357	\$2,767,135	\$6,510,907	\$1,923,503	\$488,318	\$78,770,781
2009	\$166,383,132	\$31,241,734	\$8,485,540	\$19,965,976	\$4,686,260	\$1,497,448	\$232,260,090
2010	\$203,453,971	\$94,072,394	\$10,376,152	\$24,414,477	\$14,110,860	\$1,831,086	\$348,258,940
2011	\$240,625,949	\$47,726,606	\$12,271,923	\$28,875,114	\$7,158,991	\$2,165,634	\$338,824,217
2012	\$46,577,303	\$8,130,594	\$2,854,106	\$5,589,276	\$1,219,589	\$503,666	\$64,874,534
2013	\$165,112,547	\$22,903,653	\$7,672,468	\$19,813,506	\$3,435,548	\$1,353,965	\$220,291,687
2014	\$159,975,968	\$27,432,714	\$7,398,973	\$19,197,116	\$4,114,907	\$1,305,701	\$219,425,379
2015	\$81,284,573	\$14,314,382	\$4,501,099	\$9,754,149	\$2,147,158	\$794,312	\$112,795,673
2016	\$174,168,952	\$36,487,128	\$7,889,108	\$20,900,274	\$5,473,069	\$1,392,195	\$246,310,726
2017	\$143,180,306	\$26,574,477	\$7,937,956	\$17,181,637	\$3,986,171	\$1,400,815	\$200,261,362
Total	\$1,435,020,262	\$321,707,039	\$72,154,460	\$172,202,432	\$48,256,056	\$12,733,140	\$2,062,073,389
Average	\$143,502,026	\$32,170,704	\$7,215,446	\$17,220,243	\$4,918,876	\$1,259,147	\$206,286,442

* FEMA was able to estimate BRIC amounts for 2012-2017 based on historical PA data. FEMA did not have data available to estimate BRIC allocations for 2008-2011, so FEMA used 6 percent of total PA funding per fiscal year for 2008-2011.

10. COST SAVINGS

The proposed rule would result in FEMA administrative cost savings, and paperwork cost savings for Applicants and FEMA.

10.1 Administrative Cost Savings

The proposed rulemaking would result in administrative cost savings for FEMA. To estimate the administrative cost savings, FEMA subtracted the administrative costs after implementation of the proposed rule (Table 8-5) from the baseline administrative costs (Table 7-6). FEMA estimates that from 2008-2017, implementation of the proposed rule would have resulted in a total FEMA administrative cost savings of \$624.09 million, an average of \$62.41 million per year. Table 10-1 summarizes the FEMA administrative cost savings per year. Table 10-1 also breaks down the savings due to the proposed minimum threshold and the savings due to the proposed State COA indicator.

Table 10-1 FEMA Administrative Cost Savings from Proposed Rule

Fiscal Year	Cost Savings from Minimum Threshold	Cost Savings from State COA Indicator	Total FEMA Administrative Cost Savings
2008	\$2,185,588	\$47,707,898	\$49,893,486
2009	\$3,350,471	\$47,883,014	\$51,233,485
2010	\$1,460,905	\$132,496,573	\$133,957,478
2011	\$281,372	\$48,752,530	\$49,033,902
2012	\$602,557	\$16,391,807	\$16,994,364
2013	\$ 9,993	\$40,310,082	\$40,320,075
2014	\$512,787	\$44,615,694	\$45,128,481
2015	\$229,841	\$20,548,629	\$20,778,470
2016	-	\$150,167,778	\$150,167,778
2017	-	\$66,586,288	\$66,586,288
Total	\$8,633,514	\$615,460,293	\$624,093,807
Average	\$863,351	\$61,546,029	\$62,409,381

As noted in Section 7-5 of this RIA, FEMA cannot break out the administrative costs by program. It is possible that an incident that was not authorized for the PA program could have still been authorized for the IA program since the factors are independent of PA declaration factors. For this analysis, FEMA assumed that none of the administrative costs would have been expended for the 159 PA disasters that did not exceed the proposed minimum threshold and State COA indicator. Therefore, the values presented in Table 10-1 represent an upper bound impact of the proposed rule.

10.2 Applicant Paperwork Cost Savings

The proposed rulemaking would result in a reduction in paperwork costs for Applicants. This is because there would be fewer requests for disasters to be declared and there would be fewer Applicants able to apply for relief. To estimate the paperwork cost savings, FEMA subtracted

the total paperwork costs after implementation of the proposed rule (\$20,089,283 from Section 8.4.1) from the baseline paperwork costs (\$28,124,997 from Section 7.4.1). FEMA estimated that the annual Applicant paperwork cost savings would be \$8,035,714. From 2008-2017, the proposed rule would have resulted in a total 10-year Applicant paperwork cost savings of \$80,357,140 (\$8,035,714 x 10 years).

10.3 FEMA Paperwork Cost Savings

The proposed rulemaking would result in a reduction in paperwork costs for FEMA. To estimate the paperwork cost savings, FEMA subtracted the total paperwork costs after implementation of the proposed rule (\$2,335,133 from Section 8.4.2) from the baseline paperwork costs (\$2,635,805 from Section 7.4.2). FEMA estimated that the annual FEMA paperwork cost savings would be \$300,672. From 2008- 2017, the proposed rule would have resulted in a total 10-year FEMA paperwork cost savings of \$3,006,720 (\$300,672 per year x 10 years).

11. COSTS

FEMA considered whether the proposed rule would impose any costs, including familiarization costs. The proposed rule would not create new factors for FEMA to consider when reviewing a request for a PA program major disaster declaration. The proposed rule would revise the estimated COA PA disaster declaration factor. FEMA proposes revisions to this factor to more accurately assess the disaster response capabilities of Applicants.

For the revisions to the estimated COA factor, there would be no additional costs to FEMA to update the per capita indicator and the minimum threshold by inflation. FEMA's current practice is to update the per capita indicator each fiscal year for inflation by the CPI-U and post the updated indicator on the Federal Register and FEMA website. FEMA will continue this practice. The proposed rule would require FEMA to update the minimum threshold every year for changes in inflation utilizing the CPI-U. This is a new practice, as the minimum threshold is not currently updated annually. However, FEMA already calculates the change in CPI-U from the previous fiscal year and applies the change to the per capita indicator each fiscal year. FEMA would apply the same change in CPI-U used to update the per capita indicator to the minimum threshold. This new requirement does not require any additional data pulls and applying the already calculated change in CPI-U to the minimum threshold would only require one additional simple calculation. Therefore, FEMA estimates there are no costs for updating the per capita indicator and minimum threshold by inflation.

The proposed rule would require FEMA to adjust the per capita indicator for each State's TTR, which is a new practice. FEMA estimates it would take 12.5 minutes (0.21 hours) for a FEMA employee to retrieve and store the TTR data and update the State per capita indicator. FEMA expects the TTR data retrieval would take place annually and would be completed by a FEMA

employee in the DC area at the GS-12, Step 1 level.⁴⁶ The base hourly wage rate for a GS-12, Step 1 government employee is \$39.07.⁴⁷ To account for employee benefits, FEMA multiplied the base hourly wage rate by a load factor of 1.46 to find a loaded hourly wage rate of \$57.04.⁴⁸ FEMA estimates it would cost \$12 per year for a FEMA employee to adjust the per capita indicator by TTR annually (\$57.04 wage rate x 0.21 hours).

The proposed regulations would require time for the Applicants to understand the changes made in the regulations. FEMA estimates Applicants would spend 4 hours to familiarize themselves with the proposed changes. FEMA assumed a State Government Chief Executive, a senior level government official, or equivalent occupation, would read the existing and proposed regulations to understand the changes.⁴⁹ FEMA obtained the wage rate of \$60.46 for a State Government Chief Executive from BLS OES data.⁵⁰ To account for employee benefits, FEMA multiplied the base hourly wage rate by a load factor of 1.46 to find a loaded hourly wage rate of \$88.27. FEMA assumed there would be 112 Chief Executives that review the proposed changes, two from each State. FEMA used 56 States in the estimate as this is the level from which a PA disaster declaration request is made. FEMA assumed the States regularly update their emergency response networks and local emergency management divisions on changes in the field and the States would disseminate the regulatory changes through each State's respective process. FEMA estimates it would cost \$39,545 for Applicants to familiarize themselves with the proposed rule (\$88.27 wage rate x 4 hours x 112). This would be a one-time cost for the Applicants in the first year.

FEMA would continue to post the updated per capita indicator each year and would not require any additional calculations or data requirements from the Applicants. The Applicants would continue the current practice of checking the revised per capita indicator each year. FEMA would post the revised minimum threshold along with the revised per capita indicator. As it is already current practice for Applicants to check the revisions to the per capita indicator every year, there would be no additional time to check the revised minimum threshold on the same website and Federal Register the per capita indicator is posted on. Therefore, there would be no additional or annual costs to Applicants after the first year.

⁴⁶ Estimates for time and wage rates were taken from the *Factors Considered When Evaluating a Governor's Request for Individual Assistance for a Major Disaster* Final Rule, published March 21, 2019 (page 10651), found at <https://www.govinfo.gov/content/pkg/FR-2019-03-21/pdf/2019-05388.pdf>.

⁴⁷ The GS-12, Step 1 hourly wage of \$39.07 is taken from the OPM Salary Table 2018-DCB, for the locality pay area of Washington-Baltimore-Northern Virginia, Effective January 2018, found at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB_h.pdf. FEMA used 2018 wages to keep costs in 2018 dollars.

⁴⁸ BLS Employer Costs for Employee Compensation December 2018 located at https://www.bls.gov/news.release/archives/eccec_03192019.pdf. The loaded wage factor is equal to the total compensation of \$36.32 divided by the wages and salary of \$24.91. Values for the total compensation and wages and salary are for civilian workers in the all workers occupational group.

⁴⁹ Estimates for time and wage rates were taken from the *Factors Considered When Evaluating a Governor's Request for Individual Assistance for a Major Disaster* Final Rule, published March 21, 2019 (page 10649), found at <https://www.govinfo.gov/content/pkg/FR-2019-03-21/pdf/2019-05388.pdf>.

⁵⁰ BLS OES, May 2018, NAICS code 999200, State Government, Standard Occupational Code 11-1011 for Chief Executives, mean wage. Archived BLS OES can be found at <https://www.bls.gov/oes/tables.htm>, May 2018, All data (XLS). Mean wage (h_mean) can be found by filtering by NAICS code 999200 and SOC 11-1011. FEMA used 2018 data to keep costs in 2018 dollars.

FEMA also proposes to replace all uses of the term “we” in 44 CFR 206.48(a) with “FEMA”. FEMA proposes these changes to ensure consistent language between the PA declaration factors in 44 CFR 206.48(a) and the IA factors in 44 CFR 206.48(b). As these revisions are minor grammatical changes and are only intended to create consistent language, there would be no costs due to these proposed changes.

The proposed changes could impose qualitative costs that FEMA was unable to quantify. Increasing the per capita indicator and the minimum threshold transfers the costs of PA disasters that previously would have been declared to the Applicants. This would require the Applicants to invest more in response, recovery, and mitigation capabilities. Without Federal assistance, some State and local governments may expand insurance and other risk management strategies. Transferring the costs of PA disasters to the Applicants could result in Applicants spending less on repairs, opting to repair facilities rather than replace it, or opting not to repair or replace because the damage did not impact the function of the facility or because the Applicant abandons the facility. It is possible that without Federal assistance, Applicants may opt to not repair damaged facilities or pay for other recovery efforts. Damaged facilities that are not repaired or replaced could be more susceptible to subsequent incidents in the future.

12. BENEFITS

The proposed regulatory changes would not result in any quantitative benefits but would result in qualitative benefits. The proposed regulatory changes would provide FEMA with a better informed and more accurate assessment of whether an incident has exceeded Applicant disaster capabilities when it makes its recommendations to the President. The proposed changes would also incentivize Applicants to invest more in response, recovery, and mitigation capabilities, which would provide a better distribution of responsibilities between the Applicants and the Federal government and better overall national preparedness for PA disasters. In addition, a reduction in PA declarations for small incidents would allow FEMA to better focus its efforts and resources on larger PA disasters without the complications of reallocating response resources from multiple smaller-scale commitments. Additionally, these proposed changes would provide a better distribution of responsibilities between the Applicants and the Federal government, which would ultimately lead to better overall national preparedness for disasters.

The proposed minor revisions to 44 CFR 206.48 would create consistent language between the PA declaration factors in 44 CFR 206.48(a) and the IA factors in 44 CFR 206.48(b).

13. TRIBAL GOVERNMENT IMPACTS

FEMA considered the impact of the proposed rulemaking to Tribal governments. There are 573 Tribal governments. The Tribal governments are sovereign governments and have land in 36 states, with 229 of the Tribal governments located in Alaska.⁵¹ The Tribal governments vary significantly in size, demographics, location, and emergency management capability.

The Sandy Recovery Improvement Act of 2013 (SRIA) amended the Stafford Act to provide Tribal governments the option to choose whether to make a request directly to the President for a Federal emergency or major disaster declaration or elect to be considered as part of a State's declaration request.⁵² Prior to 2013, Tribal governments could only receive disaster assistance through the State in which the Tribal government is located. From 2013-2016, FEMA processed Tribal declaration requests using adapted State declaration regulations. In January 2017, FEMA published the Tribal Declarations Pilot Guidance which started the pilot phase of Tribal declarations implementation.⁵³ Tribal governments that make a direct request are subject to the factors outlined in the Tribal Declarations Pilot Guidance and would not be impacted by the proposed rule. Tribal governments that choose to apply through the State may be impacted by the higher minimum threshold and State COA indicators proposed by the rulemaking.

The relationship between Tribal governments and States vary greatly by State and by Tribal government. The variances in relationships is too great for FEMA to definitively determine what the impact to one State, such as Alaska with 229 Tribal governments, would be compared to other States. It is possible a higher threshold and indicator could result in a State providing more assistance to the Tribal governments than they currently provide, but FEMA does not have the data to support an analysis of which States may provide more than others. A Tribal government would generally be less burdensome on a State than a similarly situated local government. This is because Tribal governments can directly request disaster declarations, so they have other options in events that have a significant Tribal impact. Local governments do not have that option. Therefore, in this section, FEMA only looked at the potential impact to unique Tribal governments.

To estimate the impact to Tribal governments, FEMA reviewed the PA disasters that would not have been declared from 2008-2017 if the proposed rule was in effect, as presented in Table 8.1 of this RIA. For the analysis in this section, FEMA used EDW PA data. The EDW PA database includes data on the Applicants for each PA disaster. For each of the 159 PA disasters that would no longer be eligible under this proposed rule, FEMA pulled the Applicant information from EDW. FEMA found that in 29 of the 159 PA disasters, PA assistance was provided to Tribal governments. FEMA excluded 10 Tribal declarations that were made from 2013-2017 from the analysis, as these were declared based on evaluations of the requesting Tribal governments, independently of a State, and would not have been impacted by this proposed rule. For these 29 disasters, there were 51 unique Tribal governments that received a total of \$10,740,870 in PA funding for a PA disaster declaration made through the State. The

⁵¹ National Congress of American Indians, <http://www.ncai.org/policy-issues/tribal-governance>.

⁵² https://www.fema.gov/media-library-data/20130726-1907-25045-3557/sria_sec_1110_tribal_requests_for_a_major_disaster_or_emergency_declarat....pdf

⁵³ Tribal Declarations Pilot Guidance found at <https://www.fema.gov/media-library/assets/documents/128307>.

average PA funding a Tribal government received (the total Federal share obligated per Tribal government) was \$210,605 over the ten-year period.⁵⁴ Of the 51 tribal governments, some received PA funding for multiple PA disasters. Specifically, there were 4 Tribal governments that received PA funding for two PA disasters over the period, so the average PA funding a Tribal government received per PA disaster was \$195,289.⁵⁵ FEMA assumed in this analysis that the 159 PA disasters that did not meet the proposed minimum threshold and proposed State COA indicator would not have been declared and the Applicants would not have received the PA funding. Therefore, FEMA assumed the 51 Tribal governments would not have received the \$10.74 million in PA funding through the State declaration.⁵⁶

While the Tribal governments would not have received these PA funds through the State, it is possible the Tribal governments could have received a portion of these funds by making a direct request. FEMA used the data on the project amounts to determine which of those incidents included Tribal government impacts above the minimum amount of \$250,000 in PA-eligible estimated damages such that those Tribal governments could have requested and been considered for a Tribal declaration. While the Tribal government subrecipients from 2008-2012 would not have been able to make a direct request because the SRIA amendments to the Stafford Act had not been implemented yet, FEMA included these years in the analysis to have a longer period of analysis to better estimate the impacts of the proposed rulemaking. Absent extraordinary circumstances, FEMA generally considers a declaration request from a Tribal government only if the Tribal government sustained at least \$250,000 in PA-eligible estimated damages or costs. This is the minimum amount for which a Tribal request would be considered but damage more than this amount does not guarantee a declaration approval. Of the 51 unique Tribal governments that received PA assistance, FEMA found there were 9 unique Tribal governments that had total project amounts greater than \$250,000 for 10 PA disasters. There was one Tribal government that had project amounts greater than \$250,000 for two PA disasters. Under this proposed rule, these Tribal governments could have requested a Tribal declaration and could have possibly still received the PA funding if granted a declaration. The total Federal share obligated for these 10 PA disasters where Tribal governments had total project amounts greater than \$250,000 was \$9,003,658 from 2008-2017.

There were 42 unique Tribal governments that had total project amounts less than \$250,000 for the 29 PA disasters found earlier where PA assistance was provided to Tribal governments. Under this proposed rule, since the project amounts did not meet the minimum damage amount for a Tribal declaration authorizing PA, absent extraordinary individualized circumstances that may have changed a result, the Tribal governments would have needed to find alternative resources for recovery assistance. The total PA funding the Tribal governments received for these PA disasters was \$1,737,212, with an average of \$41,362 per project.⁵⁷ Absent such

⁵⁴ Calculation: $\$10,740,870 / 51 \text{ unique Tribal governments} = \$210,605 \text{ average PA funding received by a Tribal government.}$

⁵⁵ Calculation: $\$10,740,870 / (51 \text{ unique Tribal governments} + 4 \text{ Tribal governments that had PA funding for two PA disasters}) = \$195,289.$

⁵⁶ At the time of the analysis, FEMA did not have data on the HMGP, PDM, and HMGP and PA management costs at the recipient and subrecipient level. FEMA only had data at this level for the PA funding and therefore this is the only funding included in the tribal government impact analysis.

⁵⁷ Calculation: $\$1,737,212 / 42 \text{ unique Tribal governments} = \$41,362 \text{ on average per project.}$

extraordinary circumstances, the \$1.74 million in PA funding would have been a reduction in transfers from FEMA to the Tribal governments as these incidents would not have been considered for a Tribal direct request.

It is possible the Tribal governments that had amounts exceeding \$250,000 minimum could have made a direct request for a declaration. However, whether a Tribal government applies through the State or makes a direct request under the Tribal Declarations Pilot Guidance depends on several factors besides the COA factor. One factor that could impact how a Tribal government chooses to make a declaration request is the nature of the incident. A hurricane typically has more widespread impacts that affects large portions of the State and several Tribal governments. Flooding can have localized impacts that only impact one Tribal government or county, as opposed to hurricanes that can be far reaching in a State. In the case of a localized incident, the Tribal government may make a direct request if the damage does not exceed the State COA indicator or have far reaching impacts. If the incident affects a large portion of the State and has high damages, then the Tribal government may be more likely to elect to be considered as part of a State request.

The US GAO surveyed 36 Tribal governments that made a request for disaster assistance from 2013-2016 and found there were four key factors that Tribal governments consider when deciding whether to make a direct request or join a State's request for a disaster declaration.⁵⁸ The Tribal governments reported that Tribal sovereignty was a major factor when considering making a direct request. Tribal governments may prefer to make a direct request in recognition of their government-to-government relationship with the Federal government. Tribal governments that span more than one State may prefer to make a direct request and deal directly with the Federal government rather than go through multiple States.

Financial considerations were the second major factor that Tribal governments reported. One financial consideration is the nonfederal cost share requirement of the PA program. PA funded disaster recovery work generally has a 75 percent Federal and 25 percent nonfederal cost share. A Tribal government that is the direct recipient would need to cover the entire nonfederal cost share, unless the President waives or adjusts the nonfederal cost share for PA.⁵⁹ A Tribal government that is a subrecipient to a State could end up paying a smaller portion of the nonfederal cost share if the Tribal government is in a State that covers a portion or all of the cost share. The portion of the cost share the State covers varies by State. According to a 2016 National Emergency Management Association (NEMA) report, for the 25 percent nonfederal cost share of the PA program, 6 States pay the entire 25 percent cost share, 7 States evenly split the cost share between the State and local government, 10 States share the 25 percent in another manner, 11 States pay no portion of the 25 percent cost share, and 19 States have other

⁵⁸ GAO, Report to Congressional Requesters, *Emergency Management: Implementation of the Major Disaster Declaration Process for Federally Recognized Tribes*, May 2018 (GAO-18-443).
<https://www.gao.gov/assets/700/691962.pdf>

⁵⁹ SRIA authorizes the President to waive or adjust only the nonfederal cost share for PA for Tribal declarations. Cost share adjustment criteria are found in 44 C.F.R. § 206.47.

cost arrangements.⁶⁰ A Tribal government located in a State that pays the full cost share would have a higher incentive to make a request through the State. The Tribal governments also reported that reimbursement of funds can be quicker when working directly with FEMA rather than submitting through the State. HMGP funds are also a consideration for Tribal governments. If the State makes the request, then the State has control over how it uses the HMGP funds across the eligible projects. If the Tribal governments make a direct request, then they have control of the full amount of HMGP funds. Control over HMGP funds may be an incentive to make a direct request.

The third factor Tribal governments consider when deciding whether to make a direct request is FEMA's policies, guidance, and technical assistance. GAO reported that some Tribal governments expressed concern over the difficulty of completing the required paperwork. Tribal governments may not have the staff, space, and recordkeeping systems necessary to meet Federal requirements. Tribal governments also consider the availability of technical assistance when deciding whether to make a direct request. While FEMA technical assistance can be provided at no cost, it is also subject to staff availability and the disaster activity at the Regional and national levels.

The fourth factor that GAO reported Tribal governments consider is the Tribal governments' emergency management capacity. A Tribal government that makes a direct request must meet the eligibility requirements and have the capability to manage the disaster declaration process and administer the assistance. For example, a Tribal government must have a FEMA-approved hazard mitigation plan to directly receive HMGP assistance or PA permanent work (Categories C-G).⁶¹ Tribal governments without a hazard mitigation plan would only have the option to receive disaster assistance through the State. Approximately 41 percent of Tribal governments have a FEMA-approved hazard mitigation plan.⁶²

Given there are numerous factors that a Tribal government considers when deciding whether to make a direct disaster declaration request or request through the State, FEMA cannot definitively say whether the Tribal governments would have made a direct request for the 10 incidents that had damages exceeding \$250,000. Even if FEMA assumed the Tribal governments made a direct request for the incidents, exceeding the \$250,000 minimum does not guarantee a declaration. There are other factors FEMA considers when making a recommendation for a declaration.⁶³ Some of the factors include the Tribal government resources, the economic impact of the incident, insurance coverage, and previous mitigation

⁶⁰ NEMA 2016 Biennial Report (page 10 of FEMA hard copy). 2016 report is not currently listed on the NEMA website but could be made available for purchase through NEMA, <https://www.nemaweb.org/>. Report does not include data for American Samoa, Northern Mariana Islands, or the US Virgin Islands.

⁶¹ 44 C.F.R. §§ 201.7 & 201.3(e)(3)).

⁶² 233 Tribal governments have approved Hazard Mitigation plans (233 divided by a total of 573 Tribal governments = 41 percent rounded). FEMA Hazard Mitigation Plan status found at: <https://www.fema.gov/hazard-mitigation-plan-status>. FEMA updates the hazard mitigation plan status quarterly on this webpage. The hazard mitigation plan status reported in this RIA was as of December 31, 2019, as accessed by FEMA on 1/28/2020.

⁶³ See 'Criteria FEMA Uses to Make Declaration Recommendations to the President,' page 34 of the Tribal Declarations Pilot Guidance found at: https://www.fema.gov/media-library-data/1523033284358-20b86875d12843441a521a6141c15099/Pilot_Guidance.pdf.

measures, as outlined in the Tribal Declarations Pilot Guidance. Furthermore, while FEMA provides a recommendation for a declaration based on the factors, it is the sole authority of the President to make a declaration.

Therefore, FEMA cannot estimate what percentage, if any, of the \$10.01 million in PA funding the Tribal governments would have still received under this proposed rule. At a minimum, unless there were extraordinary circumstances, the Tribal governments would not have received \$1.74 million for the disasters less than \$250,000. As the Tribal governments were subrecipients for the State, the total of \$10.74 million in PA funding and subsequent impacts to HMGP and BRIC funding and management costs was accounted for in the funding transfers to Applicants estimated in this RIA.

14. TOTAL IMPACT OF PROPOSED RULE

Table 14-1 presents the summary of the quantitative impacts of the proposed rule.

Table 14-1 Summary of Reduction in Transfers and Cost Savings of the Proposed Rule

Transfer, Cost, or Cost Savings Item	Annual
Reduction in Transfers	
PA Funding	\$144,534,939
HMGP Funding	\$33,330,171
BRIC Funding	\$7,267,390
PA Management Cost Funding	\$17,344,193
HMGP Management Cost Funding	\$4,999,526
BRICB Management Cost Funding	\$1,282,481
Total Reduction in Transfers	\$208,758,700
Cost Savings	
Applicant Paperwork Cost Savings	\$8,035,714
FEMA Administrative Cost Savings	\$62,409,381
FEMA Paperwork Cost Savings	\$300,672
<i>Total FEMA Cost Savings</i>	<i>\$62,710,053</i>
Total Cost Savings (Applicant and FEMA)	\$70,745,767
Costs	
Applicant Costs	
Year 1	\$39,545
Years 2-10	\$0
FEMA Costs	\$12
Total Costs, Year 1	\$39,557
Total Costs, Years 2-10	\$12

While FEMA cannot forecast future disasters or state that the proposed rule would have the same impact on a future 10-year period of analysis, FEMA uses the average impact from 2008-

2017 as an estimate of the annual impact of the proposed rule on a future 10-year period of analysis. Table 14-2 presents the total estimated reduction in transfers of the proposed rule over a 10-year period. The total 10-year undiscounted reduction in transfers to Applicants of the proposed rule would be \$2.08 billion. The 10-year estimated discounted reduction in transfers to Applicants would be \$1.48 billion at a 7 percent discount rate and \$1.79 billion at a 3 percent discount rate, with annualized reduction in transfers of \$208.8 million, using both a 7-percent and 3 percent discount rate.

Table 14-2 Total Estimated Reduction in Transfers of the Proposed Rule Over a 10-Year Period of Analysis

Year	Total Undiscounted Reduction in Transfers	Discounted	
		7%	3%
1	\$208,758,700	\$202,678,350	\$195,101,589
2	\$208,758,700	\$196,775,097	\$182,337,933
3	\$208,758,700	\$191,043,783	\$170,409,284
4	\$208,758,700	\$185,479,401	\$159,261,013
5	\$208,758,700	\$180,077,088	\$148,842,068
6	\$208,758,700	\$174,832,125	\$139,104,736
7	\$208,758,700	\$169,739,927	\$130,004,427
8	\$208,758,700	\$164,796,046	\$121,499,464
9	\$208,758,700	\$159,996,161	\$113,550,901
10	\$208,758,700	\$155,336,078	\$106,122,337
<i>Total</i>	\$2,087,587,000	\$1,780,754,055	\$1,466,233,752
<i>Annualized</i>		\$208,758,700	\$208,758,700

Table 14-3 presents the total estimated cost savings of the proposed rule over a 10-year period of analysis. The total 10-year undiscounted cost savings of the proposed rule would be \$700.40 million. The 10-year estimated discounted cost savings would be \$491.93 million at a 7 percent discount rate and \$597.46 million at a 3 percent discount rate, with annualized cost savings of \$70.04 million, using both a 7 percent and 3 percent discount rate.

Table 14-3 Total Estimated Cost Savings of the Proposed Rule Over a 10-Year Period of Analysis

Year	Applicant Cost Savings	FEMA Cost Savings	Total Undiscounted Cost Savings	Discounted	
				7%	3%
1	\$7,330,106	\$62,710,053	\$70,040,159	\$65,458,093	\$68,000,154
2	\$7,330,106	\$62,710,053	\$70,040,159	\$61,175,787	\$66,019,567
3	\$7,330,106	\$62,710,053	\$70,040,159	\$57,173,633	\$64,096,667
4	\$7,330,106	\$62,710,053	\$70,040,159	\$53,433,302	\$62,229,774
5	\$7,330,106	\$62,710,053	\$70,040,159	\$49,937,665	\$60,417,256
6	\$7,330,106	\$62,710,053	\$70,040,159	\$46,670,715	\$58,657,530
7	\$7,330,106	\$62,710,053	\$70,040,159	\$43,617,491	\$56,949,059
8	\$7,330,106	\$62,710,053	\$70,040,159	\$40,764,010	\$55,290,348
9	\$7,330,106	\$62,710,053	\$70,040,159	\$38,097,206	\$53,679,950
10	\$7,330,106	\$62,710,053	\$70,040,159	\$35,604,865	\$52,116,456
<i>Total</i>	\$73,301,060	\$627,100,530	\$700,401,590	\$491,932,768	\$597,456,763
<i>Annualized</i>				\$70,040,159	\$70,040,159

Table 14-4 presents the total costs of the proposed rule over a 10-year period of analysis. The total 10-year undiscounted costs of the proposed rule would be \$39,557. The 10-year estimated discounted costs would be \$37,042 at a 7 percent discount rate and annualized costs of \$5,274. The 10-year estimated discounted costs would be \$38,496 at a 3 percent discount rate and annualized costs of \$4,513.

Table 14-4 Total Costs of the Proposed Rule over a 10-Year Period of Analysis

Year	Applicant Costs	FEMA Costs	Total Undiscounted Costs	Discounted	
				7%	3%
1	\$39,545	\$12	\$39,557	\$36,969	\$38,405
2	\$0	\$12	\$12	\$10	\$11
3	\$0	\$12	\$12	\$10	\$11
4	\$0	\$12	\$12	\$9	\$11
5	\$0	\$12	\$12	\$9	\$10
6	\$0	\$12	\$12	\$8	\$10
7	\$0	\$12	\$12	\$7	\$10
8	\$0	\$12	\$12	\$7	\$9
9	\$0	\$12	\$12	\$7	\$9
10	\$0	\$12	\$12	\$6	\$9
<i>Total</i>	\$39,545	\$120	\$39,665	\$37,042	\$38,496
<i>Annualized</i>				\$5,274	\$4,513

15. ALTERNATIVES

FEMA evaluated several alternative regulatory approaches within FEMA's statutory discretion for implementing the proposed rule in accordance with Section 6(a)(3)(c) of Executive Order 12866 and the formal principles of OMB's Circular A-4.

15.1 No Regulatory Action

FEMA considered not proposing the minimum threshold and per capita indicator regulatory changes presented in the proposed rule. The "no regulatory action" alternative would have resulted in the funding transfers, administrative costs, and paperwork burden from 2008-2017 presented in the baseline section of this RIA.

FEMA rejected this alternative because the lack of increases to the per capita indicator from 1986 to 1999 undercuts the value of this factor as an indicator of State capacity given the 51 percent decrease in purchasing power during that time.⁶⁴ For the minimum threshold, the lack of an increase since 1999 has prevented this factor from keeping pace with inflation. By not proposing the per capita indicator and minimum threshold regulatory changes in the proposed rule, FEMA would be relying upon per capita indicator and minimum threshold factors that are no longer adequate measures of a State's capability to respond to and recover from an incident. The no regulatory action alternative would result in a greater likelihood that the President declares major PA disaster declarations for relatively small incidents that a more accurate assessment would find is within a State's financial capabilities to respond to on its own. This result would be counter to the intent of the Stafford Act that Federal assistance be supplemental and only necessary for incidents that exceed a State's capabilities. The no regulatory action alternative would disincentivize Applicants from building their capabilities to respond to small scale incidents on their own, which would undermine FEMA's ability to respond to and recover from large, complex, or concurrent large incidents, and weaken the preparedness and resilience of the Nation.

15.2 Deductible Model

FEMA considered establishing a PA deductible in order to incentivize greater State resilience to future disasters, thereby reducing future disaster costs nationally. On January 12, 2017, FEMA issued a Supplemental Advance Notice of Proposed Rulemaking (SANPRM) that presented a conceptual deductible program.⁶⁵ The SANPRM included a methodology for calculating deductible amounts based on a combination of each State's fiscal capacity and disaster risk, a proposed credit structure to reward States for undertaking resilience-building activities, and a description of how FEMA could consider implementing the program. Under the deductible model, States would have been required to expend a predetermined, annual amount of their own funds on emergency management and disaster costs before FEMA would provide PA funding for the repair and replacement of public infrastructure damaged by a PA

⁶⁴ April CPI-U was 108.6 and January 1999 CPI-U was 164.3. $(164.3-108.6)/108.6 = 51.29\%$.

⁶⁵ 82 FR 4064 (Jan. 12, 2017).

disaster.⁶⁶ The deductible amount would have been calculated annually for each State based on an index of State risk and fiscal capacity.⁶⁷ A State's fiscal capacity would have been assessed based on a composite index comprising four separate indices: per capita TTR, per capita surplus/deficit, per capita reserve funding, and the State's bond rating.⁶⁸

FEMA sought alternative approaches to improving its assessment of State fiscal capacity when recommending disaster declarations. The deductible model's four-part composite index analysis presented in the SANPRM would have taken more into account and potentially produced more accurate assessments of States' fiscal capacities, but public comments received on the SANPRM confirmed that State and local stakeholders were uncomfortable with the complexity of the analysis. FEMA believes adjusting the per capita indicator only by TTR strikes an appropriate balance between improving the fiscal capacity analysis by looking at more than simply a State's population, and not burdening States' with a complicated formula that could slow implementation of the new framework.

15.3 Per Capita Indicator Alternatives

FEMA considered several alternatives to increasing the per capita indicator for inflation by CPI-U, including: adjust the per capita indicator by per capita personal income (PCPI), adjust the indicator by PCPI and TTR, and adjust the indicator by State Gross Domestic Product or Total Actual Revenues (TAR).

15.3.1 Adjust Per Capita Indicator by PCPI

FEMA considered increasing the per capita indicator to account for increases in PCPI growth. The PCPI is all income that is received by residents in an area divided by the resident population of the area. PCPI is calculated by the US Bureau of Economic Analysis (BEA) annually. Annual estimates are released in September each year, with preliminary annual estimates available in March. The preliminary estimate for 2018 US PCPI is 53,712.⁶⁹ FEMA established the per capita indicator at \$1 in 1986 based on the 1983 US PCPI, which was the latest available published information at the time. The PCPI used to set the original per capita indicator was 11,687.⁷⁰ PCPI increased by 360 percent from 1983 to 2018 ((53,712-11,687)/11,687). FEMA used the PCPI estimate of 11,687 from the 1986 proposed rulemaking as this was the data FEMA used to set the original per capita indicator. Applying the increase

⁶⁶ Id.

⁶⁷ Id. at 4065.

⁶⁸ Id. at 4072.

⁶⁹ State Annual Personal Income, 2018 (Preliminary) and State Quarterly Personal Income, 4th Quarter 2018, Table 1: Personal Income, Population, and Per Capita Personal Income, by State and Region, 2017-2018, <https://www.bea.gov/system/files/2019-03/spi0319.pdf>.

⁷⁰ Disaster Assistance; Subpart C, the Declaration Process and State Commitments, 51 FR 13333, Apr. 18, 1986, found at <http://cdn.loc.gov/service/ll/fedreg/fr051/fr051075/fr051075.pdf>. Although FEMA did not issue a final rule, it began using \$1 per capita informally in 1986. Revisions were made to the BEA 1983 PCPI after publication of the proposed 1986 rule. FEMA used the PCPI of 11,687 to maintain consistency with the data used at the time of establishing the per capita indicator.

in PCPI to the original per capita indicator of \$1 would result in a per capita indicator of \$4.60 ($360\% * \$1 + \1). This alternative would cause an average increase in the State COA Indicator of 212.3 percent, where the CPI-U method increases it by 57.5 percent. This would have resulted in 298 fewer declared disasters, or a 51 percent decrease.

While increasing the indicator to account for increases in PCPI would tie the indicator back to the initial metric upon which the indicator was based, FEMA believes that the resulting increase to the per capita indicator to \$4.60 would be too high for many States to meet. Moreover, the potentially large changes to PCPI from year to year, in comparison to changes to the CPI-U, could result in instability and uncertainty in what the per capita indicator may be each year for States. In contrast, increasing the per capita indicator to account for increases in the CPI-U from 1986 to 1999, and annually thereafter, provides more certainty for States in determining their State COA indicator from year to year.

15.3.2 Adjust Per Capita Indicator by PCPI and TTR

FEMA considered increasing the per capita indicator for increases in PCPI and then adjusting by the individual States' TTR. FEMA multiplied the TTR per capita index for each State by the PCPI adjusted per capita indicator of \$4.60 and then divided by 100. FEMA divided by 100 to create an adjustment relative to the US' TTR of 100. FEMA used the latest available TTR per capita index data from the US Department of the Treasury.⁷¹ TTR data is not available for the territories. The US Department of the Treasury has recommended against using the TTR for DC because of the unique tax circumstances in DC. Therefore, FEMA would use the base PCPI adjusted indicator of \$4.60 for DC and the territories. Because TTR is different for each State, an adjustment for TTR resulted in a different PCPI and TTR per capita indicator for each State. Using 2018 published data, the minimum per capita indicator adjusted for this alternative would be \$3.01 (Mississippi with a TTR per capita indicator of 65.5) and the maximum indicator would be \$6.29 (Connecticut with a TTR per capita indicator of 136.8).

As with the alternative to adjust the per capita indicator by PCPI, the resultant increases to the per capita indicators, FEMA believes this would be too high for many States to meet. The proposed regulatory change of adjusting the per capita indicator for CPI-U and TTR results in per capita indicators ranging from \$1.48 to \$3.24. This alternative also has the same issue that the potentially large changes to PCPI from year to year, in comparison to changes to the CPI-U, could result in instability and uncertainty in what the per capita indicator may be each year for individual States. For these reasons, FEMA rejected this alternative.

15.3.3 Adjust Per Capita Indicator by State GDP or State TAR

FEMA considered alternatives to TTR to adjust the per capita indicator to account for a State's financial capabilities. FEMA considered using State GDP or State TAR to adjust the per capita indicator instead of using TTR. State GDP is the total value of the goods and services

⁷¹ U.S. Department of Treasury, Total Taxable Resources, located at <https://home.treasury.gov/policy-issues/economic-policy/total-taxable-resources>. Data was taken from the 2018 Total Taxable Resources Estimates-09/28/2018, Table 3, *Per Capita Index*.

produced within a State in a year. State TAR is the amount of revenue a State raises in a typical year. Both measures are strongly correlated with TTR.

FEMA rejected these alternatives in favor of using TTR to adjust the per capita indicator. TTR is based on GDP by State. TTR measures the unduplicated sum of the income flows produced within a State, and adjusts for additional, potentially taxable income flows earned by residents from out-of-state sources such as capital gains and commuter income. TTR is a value-neutral measure of a State's economic activity, which can provide insight into a State's relative fiscal capacity and changes in its economic wellbeing, regardless of taxing choices and other constraints that may be imposed on it by State law, State constitution, or policy choices. Using TTR also maintains consistency with the IA disaster declaration factors. To evaluate a State's fiscal capacity for response to a major disaster authorizing IA, FEMA reviews data on a State's TTR. Furthermore, the GAO supports the use of TTR because it provides a more comprehensive measure of a State's fiscal capacity when compared to other options, which do not include the additional, potentially taxable income flows earned by residents from out-of-state sources such as capital gains and commuter income.⁷²

15.4 Minimum Threshold Alternatives

FEMA considered using the change in GDP, State expenditures, or TTR as alternatives to CPI-U to adjust the minimum threshold. FEMA also considered using FEMA administrative costs for past smaller major disasters to calculate a minimum threshold for which FEMA's administrative burden exceeded the amount of Federal assistance provided.

15.4.1 Adjust Minimum Threshold by Changes in GDP, State Expenditures, or TTR

FEMA used BEA annual State GDP data to find the change in State GDP from 1999 to 2018, the latest available full year of data.⁷³ FEMA found the percentage change in GDP from 1999 to 2018 for each State and the US. The percentage change in GDP for the US was 113 percent (\$20,494,079 million in 2018 and \$9,630,663 million in 1999). The smallest percentage change was 56 percent for Michigan and the highest percentage change was 222 percent for North Dakota. FEMA multiplied the percentage change to the minimum threshold of \$1.0 million to find what the resultant threshold would be if FEMA used the change in GDP to update the minimum threshold. If FEMA increased the \$1.0 million threshold by 112.8 percent to reflect the change in national GDP from 1999 to 2018, the resultant threshold would be \$2,128,000 ((112.8% * \$1,000,000) + \$1,000,000).

⁷² United States Government Accountability Office, FEDERAL DISASTER ASSISTANCE: Improved Criteria Needed to Assess a Jurisdiction's Capability to Respond and Recover on Its Own, GAO-12-838, September 2012, page 31, found at <http://www.gao.gov/products/GAO-12-838>.

⁷³ Historical data table was downloaded from the BEA at the following link: <https://www.bea.gov/data/gdp/gdp-state>. Navigation to the table from the link is: Interactive Tables; Annual Gross Domestic Product (GDP) by State; GDP in Current Dollars (SAGDP2); NAICS (1997-forward); All Areas, All industry total; Years 1999 and 2018.

FEMA used expenditure data from the National Association of State Budget Officers (NASBO) to find the change in total State expenditures from 1999 to 2018.⁷⁴ FEMA found the percentage change in total expenditures from 1999 to 2018 for each State and the total for the US. The totals for the US exclude the territories and DC. The actual fiscal expenditures in 1999 was \$880.25 billion. The estimated fiscal expenditures for 2018 are \$2,032 trillion. The percentage change in total expenditures for the US from 2008 to 2018 was 130.88 percent. The smallest percentage change was 65 percent for Michigan and the largest percentage change was 309 percent for Oregon. If FEMA used the change in total State expenditures to update the minimum threshold, the minimum threshold would be \$2,308,800 ($130.88\% * \$1,000,000 + \$1,000,000$).

FEMA used TTR data from the US Department of the Treasury to find the change in TTR from 1999 to 2018.⁷⁵ FEMA found the percentage change from 1999 to 2018 for each State and the US. The 2018 TTR was \$20,443.5 billion and the TTR in 1999 was \$8,894.2 billion.⁷⁶ The percentage change in TTR for the US was 129.85 percent. The smallest percentage change was 82 percent for Michigan and the highest percentage change was 233 percent for North Dakota. FEMA multiplied the percentage change to the minimum threshold of \$1.0 million to find what the resultant threshold would be if FEMA used the change in US TTR to update the minimum threshold. If FEMA used the change in TTR to update the minimum threshold, the minimum threshold would be \$2,298,500 ($129.85\% * \$1,000,000 + \$1,000,000$).

FEMA then looked at which PA disasters from 2008-2017 would not have exceeded the alternative minimum thresholds. FEMA used the same methodology as presented in the Section 8 of this RIA to estimate how the US national changes in GDP, State expenditures, and TTR would have impacted the PA disasters from 2008-2017. For each PA disaster in the baseline, FEMA compared the project amounts to the minimum threshold alternatives and found which PA disasters were below the threshold. After removing the PA disasters that would not have been declared for each of the alternative minimum thresholds, FEMA then followed the same process to find which PA disasters would not exceed the proposed State COA indicator. Table 15-1 summarizes the findings compared to the proposed minimum threshold of \$1.535 million.

⁷⁴ Historical NASBO State Expenditure Reports can be found at <https://www.nasbo.org/reports-data/state-expenditure-report/state-expenditure-archives>. 1999 expenditures were taken from the 2000 State Expenditure Report, Table 1: Total State Expenditures – Capital Inclusive (\$ in Millions). 2018 estimated expenditures were taken from the 2018 State Expenditure Report, Table 1: Total State Expenditures – Capital Inclusive (\$ in Millions).

⁷⁵ U.S. Department of Treasury, Total Taxable Resources, located at <https://home.treasury.gov/policy-issues/economic-policy/total-taxable-resources>

⁷⁶ As there is a two-year lag on TTR data, the 2018 published TTR includes 2016 data and the 1999 published TTR includes 1997 data.

Table 15-1 Reduction in PA Disasters at Varying Thresholds

Measure	Threshold	PA Disasters Below Minimum Threshold	PA Disasters Below State COA Indicator	PA Disasters Below Minimum Threshold and State COA Indicator	Average Annual PA Disasters Below Minimum Threshold and State COA Indicator	% Reduction in PA Disasters
CPI-U (Proposed Minimum Threshold)	\$1,535,000	13	146	159	16	27.0%
GDP	\$2,128,000	29	133	162	16	27.7%
State Expenditure	\$2,308,800	32	132	164	16	28.0%
TTR	\$2,298,500	32	132	164	16	28.0%

While the resultant thresholds of the minimum threshold alternatives are higher than the proposed minimum threshold using CPI-U, the alternatives have little additional impact on the reduction in total PA disasters when accounting for the proposed State COA indicators. Increasing the minimum threshold to \$2,308,800 would initially result in an additional 19 PA disasters that did not exceed the minimum threshold. However, because FEMA is also proposing to increase the per capita indicator and the resultant State COA indicator, the minimum threshold alternatives would have only a 1 percent increase in the total PA disasters that would not have exceeded both the minimum threshold and State COA indicator from 2008-2017. Increasing the minimum threshold to account for the national average increases to State expenditures, GDP, and TTR would result in no impact to the average annual reduction in PA disasters. While State expenditures, GDP, and TTR may have a relation to the States' capabilities to respond to incidents, it is unclear that any of those alternatives would be better to set a minimum threshold and FEMA would be making a subjective choice between the three. Moreover, using a combination of these three alternatives would increase the complexity of setting the minimum threshold, with little gained benefit. Based on these results, FEMA rejected these alternative minimum thresholds.

15.4.2 Administrative Cost Minimum Threshold

FEMA analyzed whether its administrative costs for past smaller PA disasters could be used to calculate the threshold for which FEMA's administrative burden exceeded the amount of Federal assistance provided. These are instances in which FEMA's cost to deliver PA funding exceeded the cost of the PA funding provided. FEMA analyzed the administrative costs of PA disasters with less than \$50 million in PA obligations (which FEMA has historically described as 'small' disasters) and less than \$10 million in PA obligations from 2008-2017. As shown in Table 15-2, the average administrative costs for PA disasters with less than \$50 million in PA obligations was \$5,417,900 (rounded). The average administrative costs for PA disasters with \$10 million or less in PA obligations in that same time was \$2,232,500 (rounded). The following table depicts FEMA's average administrative costs for PA disasters declared from

2008-2017. FEMA considered using each of these average administrative costs as the minimum threshold.

Table 15-2 Average FEMA Administrative Costs for Disasters <\$50M and <\$10M

Fiscal Year	Average Administrative Cost per Disaster <\$50M	Average Administrative Cost per Disaster <\$10M
2008	\$4,788,655	\$2,303,224
2009	\$5,568,360	\$3,406,163
2010	\$6,588,321	\$4,370,917
2011	\$3,826,553	\$1,105,371
2012	\$4,260,251	\$1,558,866
2013	\$4,625,684	\$1,990,382
2014	\$6,860,643	\$1,398,969
2015	\$4,598,742	\$1,864,159
2016	\$8,895,127	\$2,758,063
2017	\$4,166,466	\$1,568,488
Average (rounded)	\$5,417,900	\$2,232,500

FEMA then looked at how each of these alternative minimum thresholds based on administrative costs would have impacted the PA disasters from 2008-2017. FEMA used the same methodology as presented in Section 15.3.1. For each PA disaster in the baseline, FEMA compared the project amounts of the PA disasters to the two administrative cost threshold alternatives. After finding the PA disasters that would not have exceeded each of the alternative minimum thresholds, FEMA then followed the same process to compare the PA disasters to the proposed State COA indicator. Table 15-3 presents the reduction in PA disasters at each of the administrative cost minimum thresholds and at the proposed minimum threshold of \$1.535 million.

Table 15-3 Reduction in PA Disasters for Administrative Cost Thresholds

Measure	Threshold	PA Disasters Below Minimum Threshold	PA Disasters Below State COA Indicator	PA Disasters Below Minimum Threshold and State COA Indicator	Average Annual PA Disasters Below Minimum Threshold and State COA Indicator	% Reduction in PA Disasters
CPI-U (Proposed Minimum Threshold)	\$1,535,000	13	146	159	16	27.0%
Average Admin Cost for Disasters <\$50M	\$5,417,900	109	99	208	21	35.6%
Average Admin Cost for Disasters <\$10M	\$2,232,500	29	133	162	16	27.7%

Increasing the minimum threshold to the average administrative costs for PA disasters less than \$10 million (\$2,232,500) would initially result in an additional 16 PA disasters that did not exceed the minimum threshold. After FEMA removed the PA disasters that did not exceed the proposed State thresholds, FEMA found a total of 162 PA disasters that would not have been declared from 2008-2017. This would be a 27.7 percent reduction in total PA disasters, a 0.7 percent increase over the proposed minimum threshold. Increasing the minimum threshold to the average costs for PA disasters less than \$50 million would initially result in an additional 96 PA disasters that did not exceed the minimum threshold. After FEMA removed the PA disasters that did not exceed the proposed State COA indicator, FEMA found a total of 208 PA disasters that would not have been declared from 2008-2017. This would be a 35.6 percent reduction in the total PA disasters, an 8.6 percent increase over the proposed minimum threshold of \$1.535 million.

While setting a minimum threshold using the average administrative costs for PA disasters less than \$10 million or \$50 million would result in a higher reduction of PA disasters, FEMA rejected these alternative minimum thresholds. FEMA selected the \$50 million figure because FEMA has historically defined ‘small’ disasters as \$50 million or less. However, while using the average administrative costs for \$50 million disasters to set the minimum threshold resulted in the greatest reduction in average annual PA disasters and Federal costs, \$50 million disasters are generally much larger than the types of PA disasters that FEMA is seeking to reduce. Most States have State COA indicators well below \$50 million. Accordingly, the \$50 million disaster figure does not meet FEMA’s intent to reduce the number of small disasters within States’ capabilities to respond to on their own, since a \$50 million disaster will exceed most States’ capabilities. Furthermore, raising the minimum threshold to \$5,417,900 would be a 442 percent increase from the current minimum threshold which FEMA believes is too drastic an increase for the Applicants.

FEMA evaluated using the average administrative costs for PA disasters less than \$10 million because FEMA believed this cutoff was more representative of the smaller incidents that the minimum threshold is intended to limit. However, FEMA was unable to justify using \$10 million as the cutoff for PA disaster size any more than using another value. FEMA was unable to derive a specific dollar value of estimated PA obligations at which the proportion of administrative costs relative to PA obligations could justify that a prospective minimum threshold be set at that amount. Due to the variable nature of response and recovery efforts for different PA disasters, FEMA did not find any statistically significant relationship between the amount of administrative costs for PA disasters and the total amount of PA obligations for those PA disasters, including for PA disasters with only a few million dollars of PA obligations. While administrative costs are a good representation of the Federal focus and resources expended on a given PA disaster, based on FEMA's analysis of available information, there is insufficient statistical and policy bases on which to justify increasing the minimum threshold based on FEMA's administrative costs. Based on FEMA's analysis of available information across all PA disasters in the past ten years, there is no specific size of PA disaster at which point administrative costs exceed the amount of PA funding, or where excessive administrative costs essentially renders such PA funding ineffectual from a Federal cost standpoint. Thus, FEMA believes that resetting the minimum threshold based on administrative costs is a less justifiable alternative than increasing the minimum threshold to account for inflation.

15.5 Population Alternative

FEMA considered continuing to use the U.S. Census Bureau's decennial census population estimates instead of the proposed PEP annual estimates to calculate the State COA indicators. FEMA estimated the impact of using decennial census populations on the PA disasters from 2008-2017 using the same methodology as presented in Section 8 of this RIA. For each PA disaster in the baseline, FEMA compared the project amount to the proposed minimum threshold alternatives. As the minimum threshold is not dependent on State populations, there were no impacts to the PA disasters that did not exceed the proposed minimum threshold. FEMA then followed the same process to compare the PA disasters to the proposed State COA indicator. However, instead of multiplying the proposed per capita indicators by the PEP annual population estimates, FEMA multiplied the indicators by the decennial census State populations. This was the only change FEMA made to the analysis, to compare the impact of using decennial populations versus annual estimates. FEMA used the decennial census data from the most recent survey that would have been available each fiscal year. The 2000 census population data was used for 2008-2011, and 2010 census data was used for 2012-2017.⁷⁷ The 2010 census data was not available until 2011, and therefore would not have been used by FEMA until 2012. Table 15-4 presents the PA disasters that would not have exceeded the minimum threshold and State COA indicators using the proposed PEP annual population estimates and the decennial populations.

⁷⁷ Table 5: Resident Population of the 50 States, the District of Columbia, and Puerto Rico: 2010 Census and Census 2000, found at <https://www.census.gov/data/tables/2010/dec/2010-apportionment.html>.

Table 15-4 PA Disasters that did not Exceed Proposed Minimum Threshold and State COA Indicator Using PEP and Decennial Populations

Year	State Threshold with PEP Population			State Threshold with Decennial Population		
	PA Disasters that did not Exceed Proposed Minimum Threshold	PA Disasters that did not Exceed Proposed State COA Indicator	Total	PA Disasters that did not Exceed Proposed Minimum Threshold	PA Disasters that did not Exceed State COA Indicator with Decennial	Total
2008	2	13	15	2	12	14
2009	2	16	18	2	15	17
2010	2	17	19	2	16	18
2011	1	29	30	1	27	28
2012	2	10	12	2	9	11
2013	1	17	18	1	17	18
2014	2	14	16	2	14	16
2015	1	8	9	1	8	9
2016	0	10	10	0	11	11
2017	0	12	12	0	10	10
Total	13	146	159	13	139	152
Average	1	15	16	1	14	15

FEMA found that using the decennial populations instead of the PEP annual estimates would have resulted in 152 PA disasters that did not exceed the minimum threshold and State COA indicator from 2008-2017, an average of 15 per year. This is a difference of 7 PA disasters from when FEMA used the proposed PEP annual populations in the analysis. This difference was a result of the States having a higher population with the PEP annual population estimates compared to the decennial population for the years in between the census, and therefore a higher State COA indicator.

While the decennial census is considered the most accurate account of the US population at the time it is conducted, populations fluctuate in the 10 years between when census data is available. As more time elapses after the most recently completed decennial census survey, the data from that survey becomes less reflective of the State's current population. FEMA reviewed the PEP population data and found that most States had populations that increased from 2008-2017.⁷⁸ For example, the most recent PEP population for California is 39,557,045 using 2018 data. The 2010 decennial population for California is 37,253,956. Multiplying these by the proposed California per capita indicator of \$2.63 results in a State COA indicator of \$ 97,977,904 using decennial data or \$104,035,028 using PEP data. This difference of \$6.06 million could lead to a PA disaster being declared that the State may be financially capable of responding to until the next decennial census data is available, and the updated population is reflected in the State COA indicator.

⁷⁸ IL, MI, RI, WV, and PR had populations that were lower in 2017 compared to 2008, with some fluctuations in between. Besides Puerto Rico, PEP data is not available for the territories.

FEMA rejected this alternative because FEMA believes it should use the most up-to-date population data. Decennial population data can lead to an outdated per capita indicator for States experiencing rapid changes in population. This could result in a greater likelihood that the President declares a PA disaster for incidents that may be within a State's financial capabilities to respond to on its own after it has experienced rapid population growth, or, conversely, a greater likelihood that the President does not declare a PA disaster for incidents that may actually exceed a State's capabilities to respond to on its own where that State's population has rapidly decreased.

16. RISK AND UNCERTAINTY

FEMA acknowledges there is uncertainty in the costs, benefits, and transfers presented in this RIA. The reduction in an average of 16 PA disasters per year estimated in the RIA assumed the minimum threshold and the State COA indicator were the only determining factor for a declaration. In practice, the COA factor is only one of six factors FEMA considers when deciding on recommending a PA disaster. The PA disasters removed in the retrospective analysis of PA disasters from 2008-2017 may have still been declared even if the damages did not exceed the thresholds. The reduction in transfers and cost savings estimated in this RIA could be overstating the impacts of the proposed rulemaking.

FEMA assumed in this RIA that Applicants that are unable to calculate damages that exceed the minimum threshold and State COA indicator would not apply for a PA disaster. It is possible that instead of the proposed regulatory changes decreasing PA disasters, the increased threshold and State COA indicator could incentivize Applicants to conduct more thorough PDAs to try and accumulate enough estimated damage to meet or exceed the COA factors.

Increasing the per capita indicator and the minimum threshold transfers the costs of PA disasters that previously would have been declared to the Applicants. This would require the Applicants to invest more in response, recovery, and mitigation capabilities. It is possible that without Federal assistance, Applicants may opt to not repair damaged facilities or pay for other recovery efforts. Such damaged facilities that are not repaired could be more susceptible to subsequent incidents in the future.

Appendix A: Proposed State COA Indicators

Table A-1 Proposed State COA Indicators, 2018

State	TTR	Proposed State Per Capita Indicator	Population (2018)	Proposed State COA Indicator (A)	Current State COA Indicator (B)	Difference (A-B)	Percent Change
Alabama	73.7	\$1.71	4,887,871	\$8,358,259	\$7,169,604	\$1,188,655	16.6%
Alaska	110.5	\$2.56	737,438	\$1,887,841	\$1,065,347	\$822,494	77.2%
Arizona	76.6	\$1.78	7,171,646	\$12,765,530	\$9,588,026	\$3,177,504	33.1%
Arkansas	74.2	\$1.72	3,013,825	\$5,183,779	\$4,373,877	\$809,902	18.5%
California	114.2	\$2.65	39,557,045	\$104,826,169	\$55,880,934	\$48,945,235	87.6%
Colorado	102	\$2.37	5,695,564	\$13,498,487	\$7,543,794	\$5,954,693	78.9%
Connecticut	136.8	\$3.17	3,572,665	\$11,325,348	\$5,361,146	\$5,964,202	111.2%
District of Columbia	100	\$2.32	967,171	\$2,243,837	\$902,585	\$1,341,252	148.6%
Delaware	131.7	\$3.06	702,455	\$2,149,512	\$1,346,901	\$802,611	59.6%
Florida	85.4	\$1.98	21,299,325	\$42,172,664	\$28,201,965	\$13,970,699	49.5%
Georgia	87.3	\$2.03	10,519,475	\$21,354,534	\$14,531,480	\$6,823,054	47.0%
Hawaii	99	\$2.30	1,420,491	\$3,267,129	\$2,040,452	\$1,226,677	60.1%
Idaho	74.5	\$1.73	1,754,208	\$3,034,780	\$2,351,373	\$683,407	29.1%
Illinois	108.4	\$2.51	12,741,080	\$31,980,111	\$19,245,948	\$12,734,163	66.2%
Indiana	90.7	\$2.10	6,691,878	\$14,052,944	\$9,725,703	\$4,327,241	44.5%
Iowa	102.5	\$2.38	3,156,145	\$7,511,625	\$4,569,533	\$2,942,092	64.4%
Kansas	96.3	\$2.23	2,911,505	\$6,492,656	\$4,279,677	\$2,212,979	51.7%
Kentucky	76.6	\$1.78	4,468,402	\$7,953,756	\$6,509,051	\$1,444,705	22.2%
Louisiana	85.8	\$1.99	4,659,978	\$9,273,356	\$6,800,058	\$2,473,298	36.4%
Maine	79.6	\$1.85	1,338,404	\$2,476,047	\$1,992,542	\$483,505	24.3%
Maryland	117.2	\$2.72	6,042,718	\$16,436,193	\$8,660,328	\$7,775,865	89.8%
Massachusetts	130.4	\$3.03	6,902,149	\$20,913,511	\$9,821,444	\$11,092,067	112.9%
Michigan	85.6	\$1.99	9,995,915	\$19,891,871	\$14,825,460	\$5,066,411	34.2%
Minnesota	105	\$2.44	5,611,179	\$13,691,277	\$7,955,888	\$5,735,389	72.1%
Mississippi	65.5	\$1.52	2,986,530	\$4,539,526	\$4,450,946	\$88,580	2.0%
Missouri	86.1	\$2.00	6,126,452	\$12,252,904	\$8,983,391	\$3,269,513	36.4%
Montana	80.2	\$1.86	1,062,305	\$1,975,887	\$1,484,123	\$491,764	33.1%
Nebraska	107.1	\$2.48	1,929,268	\$4,784,585	\$2,739,512	\$2,045,073	74.7%
Nevada	91.9	\$2.13	3,034,392	\$6,463,255	\$4,050,827	\$2,412,428	59.6%
New Hampshire	112.9	\$2.62	1,356,458	\$3,553,920	\$1,974,705	\$1,579,215	80.0%
New Jersey	122.8	\$2.85	8,908,520	\$25,389,282	\$13,187,841	\$12,201,441	92.5%
New Mexico	76	\$1.76	2,095,428	\$3,687,953	\$3,088,769	\$599,184	19.4%
New York	132	\$3.06	19,542,209	\$59,799,160	\$29,067,153	\$30,732,007	105.7%
North Carolina	86.4	\$2.00	10,383,620	\$20,767,240	\$14,303,225	\$6,464,015	45.2%
North Dakota	119.8	\$2.78	760,077	\$2,113,014	\$1,008,887	\$1,104,127	109.4%
Ohio	91.6	\$2.13	11,689,442	\$24,898,511	\$17,304,756	\$7,593,755	43.9%

Oklahoma	80.7	\$1.87	3,943,079	\$7,373,558	\$5,627,027	\$1,746,531	31.0%
Oregon	95.7	\$2.22	4,190,713	\$9,303,383	\$5,746,611	\$3,556,772	61.9%
Pennsylvania	100.4	\$2.33	12,807,060	\$29,840,450	\$19,053,569	\$10,786,881	56.6%
Rhode Island	101.9	\$2.36	1,057,315	\$2,495,263	\$1,578,851	\$916,412	58.0%
South Carolina	75.5	\$1.75	5,084,127	\$8,897,222	\$6,938,046	\$1,959,176	28.2%
South Dakota	100	\$2.32	882,235	\$2,046,785	\$1,221,270	\$825,515	67.6%
Tennessee	84.9	\$1.97	6,770,010	\$13,336,920	\$9,519,158	\$3,817,762	40.1%
Texas	96.6	\$2.24	28,701,845	\$64,292,133	\$37,718,342	\$26,573,791	70.5%
Utah	87.4	\$2.03	3,161,105	\$6,417,043	\$4,145,828	\$2,271,215	54.8%
Vermont	91.7	\$2.13	626,299	\$1,334,017	\$938,612	\$395,405	42.1%
Virginia	105.1	\$2.44	8,517,685	\$20,783,151	\$12,001,536	\$8,781,615	73.2%
Washington	116	\$2.69	7,535,591	\$20,270,740	\$10,086,810	\$10,183,930	101.0%
West Virginia	72	\$1.67	1,805,832	\$3,015,739	\$2,779,491	\$236,248	8.5%
Wisconsin	95.4	\$2.21	5,813,568	\$12,847,985	\$8,530,479	\$4,317,506	50.6%
Wyoming	117.9	\$2.74	577,737	\$1,582,999	\$845,439	\$737,560	87.2%
Puerto Rico	100	\$2.32	3,195,153	\$7,412,755	\$5,588,684	\$1,824,071	32.6%
American Samoa	100	\$2.32	55,519	\$128,804	\$83,279	\$45,525	54.7%
Guam	100	\$2.32	159,358	\$369,711	\$239,037	\$130,674	54.7%
Northern Mariana Islands	100	\$2.32	44,943	\$104,268	\$67,415	\$36,853	54.7%
Virgin Islands	100	\$2.32	106,405	\$246,860	\$159,608	\$87,252	54.7%

Note: PEP population data is not available for the territories besides Puerto Rico. US Census Bureau decennial population data was used for American Samoa, Guam, Northern Mariana Islands, and the US Virgin Islands.

Appendix B: State COA Indicators for Years 2008-2017

Table B-1 2008 State COA Indicators

State	TTR	State per Capita Indicator	Population	State COA Indicator
Alabama	79.4	\$1.84	4,627,851	\$8,515,246
Alaska	131.8	\$3.06	683,478	\$2,091,443
Arizona	86.9	\$2.02	6,338,755	\$12,804,285
Arkansas	74.9	\$1.74	2,834,797	\$4,932,547
California	105.8	\$2.46	36,553,215	\$89,920,909
Colorado	108.8	\$2.52	4,861,515	\$12,251,018
Connecticut	141.1	\$3.27	3,502,309	\$11,452,550
District of Columbia	100.0	\$2.32	864,764	\$2,006,252
Delaware	168.8	\$3.92	588,292	\$2,306,105
Florida	100.6	\$2.33	18,251,243	\$42,525,396
Georgia	91.0	\$2.11	9,544,750	\$20,139,423
Hawaii	101.2	\$2.35	1,283,388	\$3,015,962
Idaho	79.6	\$1.85	1,499,402	\$2,773,894
Illinois	103.5	\$2.40	12,852,548	\$30,846,115
Indiana	89.7	\$2.08	6,345,289	\$13,198,201
Iowa	93.8	\$2.18	2,988,046	\$6,513,940
Kansas	94.4	\$2.19	2,775,997	\$6,079,433
Kentucky	78.8	\$1.83	4,241,474	\$7,761,897
Louisiana	90.4	\$2.10	4,293,204	\$9,015,728
Maine	82.5	\$1.91	1,317,207	\$2,515,865
Maryland	116.7	\$2.71	5,618,344	\$15,225,712
Massachusetts	120.2	\$2.79	6,449,755	\$17,994,816

Michigan	85.8	\$1.99	10,071,822	\$20,042,926
Minnesota	106.1	\$2.46	5,197,621	\$12,786,148
Mississippi	67.1	\$1.56	2,918,785	\$4,553,305
Missouri	88.9	\$2.06	5,878,415	\$12,109,535
Montana	78.9	\$1.83	957,861	\$1,752,886
Nebraska	96.9	\$2.25	1,774,571	\$3,992,785
Nevada	116.9	\$2.71	2,565,382	\$6,952,185
New Hampshire	108.2	\$2.51	1,315,828	\$3,302,728
New Jersey	125.3	\$2.91	8,685,920	\$25,276,027
New Mexico	85.4	\$1.98	1,969,915	\$3,900,432
New York	119.7	\$2.78	19,297,729	\$53,647,687
North Carolina	93.3	\$2.16	9,061,032	\$19,571,829
North Dakota	92.7	\$2.15	639,715	\$1,375,387
Ohio	90.4	\$2.10	11,466,917	\$24,080,526
Oklahoma	81.9	\$1.90	3,617,316	\$6,872,900
Oregon	93.7	\$2.17	3,747,455	\$8,131,977
Pennsylvania	94.4	\$2.19	12,432,792	\$27,227,814
Rhode Island	104.1	\$2.42	1,057,832	\$2,559,953
South Carolina	79.5	\$1.84	4,407,709	\$8,110,185
South Dakota	96.3	\$2.24	796,214	\$1,783,519
Tennessee	87.2	\$2.02	6,156,719	\$12,436,572
Texas	98.8	\$2.29	23,904,380	\$54,741,030
Utah	83.4	\$1.93	2,645,330	\$5,105,487
Vermont	90.7	\$2.11	621,254	\$1,310,846

Virginia	114.4	\$2.65	7,712,091	\$20,437,041
Washington	103.3	\$2.40	6,468,424	\$15,524,218
West Virginia	71.7	\$1.66	1,812,035	\$3,007,978
Wisconsin	93.4	\$2.17	5,601,640	\$12,155,559
Wyoming	133.0	\$3.09	522,830	\$1,615,545
Puerto Rico	100.0	\$2.32	3,942,375	\$9,146,310
American Samoa	100.0	\$2.32	57,291	\$132,915
Guam	100.0	\$2.32	154,805	\$359,148
Northern Mariana Islands	100.0	\$2.32	69,221	\$160,593
Virgin Islands	100.0	\$2.32	108,612	\$251,980

Table B-2 2009 State COA Indicators

State	TTR	State per Capita Indicator	Population	State COA Indicator
Alabama	78.5	\$1.82	4,661,900	\$8,484,658
Alaska	133.2	\$3.09	686,293	\$2,120,645
Arizona	88.2	\$2.05	6,500,180	\$13,325,369
Arkansas	73.7	\$1.71	2,855,390	\$4,882,717
California	107.8	\$2.50	36,756,666	\$91,891,665
Colorado	107.4	\$2.49	4,939,456	\$12,299,245
Connecticut	143.3	\$3.32	3,501,252	\$11,624,157
District of Columbia	100.0	\$2.32	873,092	\$2,025,573
Delaware	156.3	\$3.63	591,833	\$2,148,354
Florida	100.5	\$2.33	18,328,340	\$42,705,032
Georgia	89.1	\$2.07	9,685,744	\$20,049,490
Hawaii	101.9	\$2.36	1,288,198	\$3,040,147

Idaho	79.5	\$1.84	1,523,816	\$2,803,821
Illinois	103.9	\$2.41	12,901,563	\$31,092,767
Indiana	85.7	\$1.99	6,376,792	\$12,689,816
Iowa	91.6	\$2.13	3,002,555	\$6,395,442
Kansas	93.9	\$2.18	2,802,134	\$6,108,652
Kentucky	78.2	\$1.81	4,269,245	\$7,727,333
Louisiana	102.9	\$2.39	4,410,796	\$10,541,802
Maine	81.6	\$1.89	1,316,456	\$2,488,102
Maryland	116.5	\$2.70	5,633,597	\$15,210,712
Massachusetts	120.1	\$2.79	6,497,967	\$18,129,328
Michigan	82.0	\$1.90	10,003,422	\$19,006,502
Minnesota	104.6	\$2.43	5,220,393	\$12,685,555
Mississippi	68.1	\$1.58	2,938,618	\$4,643,016
Missouri	85.7	\$1.99	5,911,605	\$11,764,094
Montana	80.2	\$1.86	967,440	\$1,799,438
Nebraska	95.1	\$2.21	1,783,432	\$3,941,385
Nevada	118.1	\$2.74	2,600,167	\$7,124,458
New Hampshire	106.5	\$2.47	1,315,809	\$3,250,048
New Jersey	126.0	\$2.92	8,682,661	\$25,353,370
New Mexico	82.5	\$1.91	1,984,356	\$3,790,120
New York	121.8	\$2.83	19,490,297	\$55,157,541
North Carolina	94.0	\$2.18	9,222,414	\$20,104,863
North Dakota	90.5	\$2.10	641,481	\$1,347,110
Ohio	87.7	\$2.03	11,485,910	\$23,316,397

Oklahoma	83.4	\$1.93	3,642,361	\$7,029,757
Oregon	93.9	\$2.18	3,790,060	\$8,262,331
Pennsylvania	94.0	\$2.18	12,448,279	\$27,137,248
Rhode Island	104.2	\$2.42	1,050,788	\$2,542,907
South Carolina	78.1	\$1.81	4,479,800	\$8,108,438
South Dakota	95.8	\$2.22	804,194	\$1,785,311
Tennessee	85.3	\$1.98	6,214,888	\$12,305,478
Texas	99.0	\$2.30	24,326,974	\$55,952,040
Utah	83.9	\$1.95	2,736,424	\$5,336,027
Vermont	90.4	\$2.10	621,270	\$1,304,667
Virginia	113.2	\$2.63	7,769,089	\$20,432,704
Washington	104.9	\$2.43	6,549,224	\$15,914,614
West Virginia	71.6	\$1.66	1,814,468	\$3,012,017
Wisconsin	91.3	\$2.12	5,627,967	\$11,931,290
Wyoming	142.4	\$3.30	532,668	\$1,757,804
Puerto Rico	100.0	\$2.32	3,954,037	\$9,173,366
American Samoa	100.0	\$2.32	57,291	\$132,915
Guam	100.0	\$2.32	154,805	\$359,148
Northern Mariana Islands	100.0	\$2.32	69,221	\$160,593
Virgin Islands	100.0	\$2.32	108,612	\$251,980

Table B-3 2010 State COA Indicators

State	TTR	State per Capita Indicator	Population	State COA Indicator
Alabama	78.2	\$1.81	4,708,708	\$8,522,761
Alaska	131.7	\$3.06	698,473	\$2,137,327

Arizona	84.9	\$1.97	6,595,778	\$12,993,683
Arkansas	74.0	\$1.72	2,889,450	\$4,969,854
California	107.3	\$2.49	36,961,664	\$92,034,543
Colorado	106.3	\$2.47	5,024,748	\$12,411,128
Connecticut	146.5	\$3.40	3,518,288	\$11,962,179
District of Columbia	100.0	\$2.32	885,122	\$2,053,483
Delaware	153.9	\$3.57	599,657	\$2,140,775
Florida	99.5	\$2.31	18,537,969	\$42,822,708
Georgia	87.3	\$2.03	9,829,211	\$19,953,298
Hawaii	103.0	\$2.39	1,295,178	\$3,095,475
Idaho	79.9	\$1.85	1,545,801	\$2,859,732
Illinois	105.8	\$2.45	12,910,409	\$31,630,502
Indiana	85.9	\$1.99	6,423,113	\$12,781,995
Iowa	93.6	\$2.17	3,007,856	\$6,527,048
Kansas	94.9	\$2.20	2,818,747	\$6,201,243
Kentucky	77.7	\$1.80	4,314,113	\$7,765,403
Louisiana	97.1	\$2.25	4,492,076	\$10,107,171
Maine	81.6	\$1.89	1,318,301	\$2,491,589
Maryland	116.0	\$2.69	5,699,478	\$15,331,596
Massachusetts	121.4	\$2.82	6,593,587	\$18,593,915
Michigan	80.9	\$1.88	9,969,727	\$18,743,087
Minnesota	104.9	\$2.43	5,266,214	\$12,796,900
Mississippi	66.6	\$1.55	2,951,996	\$4,575,594
Missouri	85.6	\$1.99	5,987,580	\$11,915,284

Montana	82.0	\$1.90	974,989	\$1,852,479
Nebraska	98.1	\$2.28	1,796,619	\$4,096,291
Nevada	115.4	\$2.68	2,643,085	\$7,083,468
New Hampshire	107.0	\$2.48	1,324,575	\$3,284,946
New Jersey	126.7	\$2.94	8,707,739	\$25,600,753
New Mexico	82.1	\$1.90	2,009,671	\$3,818,375
New York	125.7	\$2.92	19,541,453	\$57,061,043
North Carolina	91.4	\$2.12	9,380,884	\$19,887,474
North Dakota	95.2	\$2.21	646,844	\$1,429,525
Ohio	86.4	\$2.00	11,542,645	\$23,085,290
Oklahoma	83.9	\$1.95	3,687,050	\$7,189,748
Oregon	93.8	\$2.18	3,825,657	\$8,339,932
Pennsylvania	94.9	\$2.20	12,604,767	\$27,730,487
Rhode Island	104.1	\$2.42	1,053,209	\$2,548,766
South Carolina	76.7	\$1.78	4,561,242	\$8,119,011
South Dakota	99.6	\$2.31	812,383	\$1,876,605
Tennessee	84.5	\$1.96	6,296,254	\$12,340,658
Texas	99.6	\$2.31	24,782,302	\$57,247,118
Utah	83.0	\$1.93	2,784,572	\$5,374,224
Vermont	91.6	\$2.13	621,760	\$1,324,349
Virginia	112.1	\$2.60	7,882,590	\$20,494,734
Washington	107.3	\$2.49	6,664,195	\$16,593,846
West Virginia	71.4	\$1.66	1,819,777	\$3,020,830
Wisconsin	91.6	\$2.13	5,654,774	\$12,044,669

Wyoming	144.1	\$3.34	544,270	\$1,817,862
Puerto Rico	100.0	\$2.32	3,967,288	\$9,204,108
American Samoa	100.0	\$2.32	57,291	\$132,915
Guam	100.0	\$2.32	154,805	\$359,148
Northern Mariana Islands	100.0	\$2.32	69,221	\$160,593
Virgin Islands	100.0	\$2.32	108,612	\$251,980

Table B-4 2011 State COA Indicators

State	TTR	State per Capita Indicator	Population	State COA Indicator
Alabama	78.2	\$1.81	4,779,736	\$8,651,322
Alaska	131.7	\$3.06	710,231	\$2,173,307
Arizona	84.9	\$1.97	6,392,017	\$12,592,273
Arkansas	74.0	\$1.72	2,915,918	\$5,015,379
California	107.3	\$2.49	37,253,956	\$92,762,350
Colorado	106.3	\$2.47	5,029,196	\$12,422,114
Connecticut	146.5	\$3.40	3,574,097	\$12,151,930
District of Columbia	100.0	\$2.32	897,934	\$2,083,207
Delaware	153.9	\$3.57	601,723	\$2,148,151
Florida	99.5	\$2.31	18,801,310	\$43,431,026
Georgia	87.3	\$2.03	9,687,653	\$19,665,936
Hawaii	103.0	\$2.39	1,360,301	\$3,251,119
Idaho	79.9	\$1.85	1,567,582	\$2,900,027
Illinois	105.8	\$2.45	12,830,632	\$31,435,048
Indiana	85.9	\$1.99	6,483,802	\$12,902,766
Iowa	93.6	\$2.17	3,046,355	\$6,610,590

Kansas	94.9	\$2.20	2,853,118	\$6,276,860
Kentucky	77.7	\$1.80	4,339,367	\$7,810,861
Louisiana	97.1	\$2.25	4,533,372	\$10,200,087
Maine	81.6	\$1.89	1,328,361	\$2,510,602
Maryland	116.0	\$2.69	5,773,552	\$15,530,855
Massachusetts	121.4	\$2.82	6,547,629	\$18,464,314
Michigan	80.9	\$1.88	9,883,640	\$18,581,243
Minnesota	104.9	\$2.43	5,303,925	\$12,888,538
Mississippi	66.6	\$1.55	2,967,297	\$4,599,310
Missouri	85.6	\$1.99	5,988,927	\$11,917,965
Montana	82.0	\$1.90	989,415	\$1,879,889
Nebraska	98.1	\$2.28	1,826,341	\$4,164,057
Nevada	115.4	\$2.68	2,700,551	\$7,237,477
New Hampshire	107.0	\$2.48	1,316,470	\$3,264,846
New Jersey	126.7	\$2.94	8,791,894	\$25,848,168
New Mexico	82.1	\$1.90	2,059,179	\$3,912,440
New York	125.7	\$2.92	19,378,102	\$56,584,058
North Carolina	91.4	\$2.12	9,535,483	\$20,215,224
North Dakota	95.2	\$2.21	672,591	\$1,486,426
Ohio	86.4	\$2.00	11,536,504	\$23,073,008
Oklahoma	83.9	\$1.95	3,751,351	\$7,315,134
Oregon	93.8	\$2.18	3,831,074	\$8,351,741
Pennsylvania	94.9	\$2.20	12,702,379	\$27,945,234
Rhode Island	104.1	\$2.42	1,052,567	\$2,547,212

South Carolina	76.7	\$1.78	4,625,364	\$8,233,148
South Dakota	99.6	\$2.31	814,180	\$1,880,756
Tennessee	84.5	\$1.96	6,346,105	\$12,438,366
Texas	99.6	\$2.31	25,145,561	\$58,086,246
Utah	83.0	\$1.93	2,763,885	\$5,334,298
Vermont	91.6	\$2.13	625,741	\$1,332,828
Virginia	112.1	\$2.60	8,001,024	\$20,802,662
Washington	107.3	\$2.49	6,724,540	\$16,744,105
West Virginia	71.4	\$1.66	1,852,994	\$3,075,970
Wisconsin	91.6	\$2.13	5,686,986	\$12,113,280
Wyoming	144.1	\$3.34	563,626	\$1,882,511
Puerto Rico	100.0	\$2.32	3,725,789	\$8,643,830
American Samoa	100.0	\$2.32	57,291	\$132,915
Guam	100.0	\$2.32	154,805	\$359,148
Northern Mariana Islands	100.0	\$2.32	69,221	\$160,593
Virgin Islands	100.0	\$2.32	108,612	\$251,980

Table B-5 2012 State COA Indicators

State	TTR	State per Capita Indicator	Population	State COA Indicator
Alabama	77.6	\$1.80	4,802,740	\$8,644,932
Alaska	134.0	\$3.11	722,718	\$2,247,653
Arizona	85.9	\$1.99	6,482,505	\$12,900,185
Arkansas	76.9	\$1.78	2,937,979	\$5,229,603
California	106.5	\$2.47	37,691,912	\$93,099,023
Colorado	109.0	\$2.53	5,116,796	\$12,945,494

Connecticut	147.6	\$3.42	3,580,709	\$12,246,025
District of Columbia	100.0	\$2.32	907,135	\$2,104,553
Delaware	149.0	\$3.46	617,996	\$2,138,266
Florida	92.1	\$2.14	19,057,542	\$40,783,140
Georgia	87.7	\$2.03	9,815,210	\$19,924,876
Hawaii	104.1	\$2.42	1,374,810	\$3,327,040
Idaho	77.4	\$1.80	1,584,985	\$2,852,973
Illinois	107.4	\$2.49	12,869,257	\$32,044,450
Indiana	88.5	\$2.05	6,516,922	\$13,359,690
Iowa	98.6	\$2.29	3,062,309	\$7,012,688
Kansas	98.6	\$2.29	2,871,238	\$6,575,135
Kentucky	79.2	\$1.84	4,369,356	\$8,039,615
Louisiana	97.0	\$2.25	4,574,836	\$10,293,381
Maine	83.8	\$1.94	1,328,188	\$2,576,685
Maryland	121.0	\$2.81	5,828,289	\$16,377,492
Massachusetts	120.8	\$2.80	6,587,536	\$18,445,101
Michigan	80.9	\$1.88	9,876,187	\$18,567,232
Minnesota	105.2	\$2.44	5,344,861	\$13,041,461
Mississippi	71.8	\$1.67	2,978,512	\$4,974,115
Missouri	88.5	\$2.05	6,010,688	\$12,321,910
Montana	80.8	\$1.87	998,199	\$1,866,632
Nebraska	103.5	\$2.40	1,842,641	\$4,422,338
Nevada	102.9	\$2.39	2,723,322	\$6,508,740
New Hampshire	107.8	\$2.50	1,318,194	\$3,295,485

New Jersey	127.5	\$2.96	8,821,155	\$26,110,619
New Mexico	81.2	\$1.88	2,082,224	\$3,914,581
New York	123.9	\$2.87	19,465,197	\$55,865,115
North Carolina	90.7	\$2.10	9,656,401	\$20,278,442
North Dakota	103.0	\$2.39	683,932	\$1,634,597
Ohio	86.7	\$2.01	11,544,951	\$23,205,352
Oklahoma	85.1	\$1.97	3,791,508	\$7,469,271
Oregon	96.2	\$2.23	3,871,859	\$8,634,246
Pennsylvania	96.3	\$2.23	12,742,886	\$28,416,636
Rhode Island	104.1	\$2.42	1,051,302	\$2,544,151
South Carolina	76.9	\$1.78	4,679,230	\$8,329,029
South Dakota	106.2	\$2.46	824,082	\$2,027,242
Tennessee	83.4	\$1.93	6,403,353	\$12,358,471
Texas	98.3	\$2.28	25,674,681	\$58,538,273
Utah	87.1	\$2.02	2,817,222	\$5,690,788
Vermont	90.5	\$2.10	626,431	\$1,315,505
Virginia	116.3	\$2.70	8,096,604	\$21,860,831
Washington	108.4	\$2.51	6,830,038	\$17,143,395
West Virginia	75.8	\$1.76	1,855,364	\$3,265,441
Wisconsin	92.7	\$2.15	5,711,767	\$12,280,299
Wyoming	142.8	\$3.31	568,158	\$1,880,603
Puerto Rico	100.0	\$2.32	3,706,690	\$8,599,521
American Samoa	100.0	\$2.32	57,291	\$132,915
Guam	100.0	\$2.32	154,805	\$359,148

Northern Mariana Islands	100.0	\$2.32	69,221	\$160,593
Virgin Islands	100.0	\$2.32	108,612	\$251,980

Table B-6 2013 State COA Indicators

State	TTR	State per Capita Indicator	Population	State COA Indicator
Alabama	77.0	\$1.79	4,822,023	\$8,631,421
Alaska	133.7	\$3.10	731,449	\$2,267,492
Arizona	82.7	\$1.92	6,553,255	\$12,582,250
Arkansas	76.7	\$1.78	2,949,131	\$5,249,453
California	105.4	\$2.45	38,041,430	\$93,201,504
Colorado	106.2	\$2.46	5,187,582	\$12,761,452
Connecticut	143.6	\$3.33	3,590,347	\$11,955,856
District of Columbia	100.0	\$2.32	917,092	\$2,127,653
Delaware	151.4	\$3.51	632,323	\$2,219,454
Florida	90.6	\$2.10	19,317,568	\$40,566,893
Georgia	86.9	\$2.02	9,919,945	\$20,038,289
Hawaii	100.1	\$2.32	1,392,313	\$3,230,166
Idaho	77.3	\$1.79	1,595,728	\$2,856,353
Illinois	107.4	\$2.49	12,875,255	\$32,059,385
Indiana	88.3	\$2.05	6,537,334	\$13,401,535
Iowa	99.1	\$2.30	3,074,186	\$7,070,628
Kansas	98.1	\$2.28	2,885,905	\$6,579,863
Kentucky	78.6	\$1.82	4,380,415	\$7,972,355
Louisiana	105.6	\$2.45	4,601,893	\$11,274,638
Maine	83.2	\$1.93	1,329,192	\$2,565,341

Maryland	120.5	\$2.80	5,884,563	\$16,476,776
Massachusetts	124.2	\$2.88	6,646,144	\$19,140,895
Michigan	79.1	\$1.84	9,883,360	\$18,185,382
Minnesota	107.5	\$2.49	5,379,139	\$13,394,056
Mississippi	70.8	\$1.64	2,984,926	\$4,895,279
Missouri	88.2	\$2.05	6,021,988	\$12,345,075
Montana	80.9	\$1.88	1,005,141	\$1,889,665
Nebraska	105.3	\$2.44	1,855,525	\$4,527,481
Nevada	101.4	\$2.35	2,758,931	\$6,483,488
New Hampshire	110.8	\$2.57	1,320,718	\$3,394,245
New Jersey	126.6	\$2.94	8,864,590	\$26,061,895
New Mexico	78.9	\$1.83	2,085,538	\$3,816,535
New York	125.1	\$2.90	19,570,261	\$56,753,757
North Carolina	91.6	\$2.13	9,752,073	\$20,771,915
North Dakota	111.6	\$2.59	699,628	\$1,812,037
Ohio	86.0	\$2.00	11,544,225	\$23,088,450
Oklahoma	85.1	\$1.97	3,814,820	\$7,515,195
Oregon	102.1	\$2.37	3,899,353	\$9,241,467
Pennsylvania	95.9	\$2.22	12,763,536	\$28,335,050
Rhode Island	104.9	\$2.43	1,050,292	\$2,552,210
South Carolina	75.2	\$1.74	4,723,723	\$8,219,278
South Dakota	103.5	\$2.40	833,354	\$2,000,050
Tennessee	85.1	\$1.97	6,456,243	\$12,718,799
Texas	100.9	\$2.34	26,059,203	\$60,978,535

Utah	89.0	\$2.06	2,855,287	\$5,881,891
Vermont	89.8	\$2.08	626,011	\$1,302,103
Virginia	115.5	\$2.68	8,185,867	\$21,938,124
Washington	106.8	\$2.48	6,897,012	\$17,104,590
West Virginia	74.4	\$1.73	1,855,413	\$3,209,864
Wisconsin	92.6	\$2.15	5,726,398	\$12,311,756
Wyoming	138.7	\$3.22	576,412	\$1,856,047
Puerto Rico	100.0	\$2.32	3,667,084	\$8,507,635
American Samoa	100.0	\$2.32	55,519	\$128,804
Guam	100.0	\$2.32	159,358	\$369,711
Northern Mariana Islands	100.0	\$2.32	44,943	\$104,268
Virgin Islands	100.0	\$2.32	106,405	\$246,860

Table B-7 2014 State COA Indicators

State	TTR	State per Capita Indicator	Population	State COA Indicator
Alabama	78.2	\$1.81	4,833,722	\$8,749,037
Alaska	137.4	\$3.19	735,132	\$2,345,071
Arizona	81.5	\$1.89	6,626,624	\$12,524,319
Arkansas	77.3	\$1.79	2,959,373	\$5,297,278
California	103.0	\$2.39	38,332,521	\$91,614,725
Colorado	106.5	\$2.47	5,268,367	\$13,012,866
Connecticut	141.4	\$3.28	3,596,080	\$11,795,142
District of Columbia	100.0	\$2.32	925,749	\$2,147,738
Delaware	146.7	\$3.40	646,449	\$2,197,927
Florida	88.9	\$2.06	19,552,860	\$40,278,892

Georgia	86.4	\$2.00	9,992,167	\$19,984,334
Hawaii	102.6	\$2.38	1,404,054	\$3,341,649
Idaho	76.1	\$1.77	1,612,136	\$2,853,481
Illinois	107.5	\$2.49	12,882,135	\$32,076,516
Indiana	90.6	\$2.10	6,570,902	\$13,798,894
Iowa	99.1	\$2.30	3,090,416	\$7,107,957
Kansas	100.9	\$2.34	2,893,957	\$6,771,859
Kentucky	79.9	\$1.85	4,395,295	\$8,131,296
Louisiana	103.9	\$2.41	4,625,470	\$11,147,383
Maine	83.6	\$1.94	1,328,302	\$2,576,906
Maryland	121.1	\$2.81	5,928,814	\$16,659,967
Massachusetts	123.7	\$2.87	6,692,824	\$19,208,405
Michigan	80.2	\$1.86	9,895,622	\$18,405,857
Minnesota	107.0	\$2.48	5,420,380	\$13,442,542
Mississippi	70.1	\$1.63	2,991,207	\$4,875,667
Missouri	87.8	\$2.04	6,044,171	\$12,330,109
Montana	82.8	\$1.92	1,015,165	\$1,949,117
Nebraska	107.6	\$2.50	1,868,516	\$4,671,290
Nevada	99.5	\$2.31	2,790,136	\$6,445,214
New Hampshire	110.1	\$2.55	1,323,459	\$3,374,820
New Jersey	126.4	\$2.93	8,899,339	\$26,075,063
New Mexico	78.2	\$1.81	2,085,287	\$3,774,369
New York	125.4	\$2.91	19,651,127	\$57,184,780
North Carolina	90.7	\$2.10	9,848,060	\$20,680,926

North Dakota	118.5	\$2.75	723,393	\$1,989,331
Ohio	87.5	\$2.03	11,570,808	\$23,488,740
Oklahoma	86.4	\$2.00	3,850,568	\$7,701,136
Oregon	100.2	\$2.32	3,930,065	\$9,117,751
Pennsylvania	96.4	\$2.24	12,773,801	\$28,613,314
Rhode Island	104.6	\$2.43	1,051,511	\$2,555,172
South Carolina	75.8	\$1.76	4,774,839	\$8,403,717
South Dakota	108.6	\$2.52	844,877	\$2,129,090
Tennessee	84.4	\$1.96	6,495,978	\$12,732,117
Texas	104.0	\$2.41	26,448,193	\$63,740,145
Utah	88.5	\$2.05	2,900,872	\$5,946,788
Vermont	91.9	\$2.13	626,630	\$1,334,722
Virginia	115.2	\$2.67	8,260,405	\$22,055,281
Washington	107.7	\$2.50	6,971,406	\$17,428,515
West Virginia	76.6	\$1.78	1,854,304	\$3,300,661
Wisconsin	92.6	\$2.15	5,742,713	\$12,346,833
Wyoming	140.4	\$3.26	582,658	\$1,899,465
Puerto Rico	100.0	\$2.32	3,615,086	\$8,387,000
American Samoa	100.0	\$2.32	55,519	\$128,804
Guam	100.0	\$2.32	159,358	\$369,711
Northern Mariana Islands	100.0	\$2.32	44,943	\$104,268
Virgin Islands	100.0	\$2.32	106,405	\$246,860

Table B-8 2015 State COA Indicators

State	TTR	State per Capita Indicator	Population	State COA Indicator
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Alabama	76.8	\$1.78	4,849,377	\$8,631,891
Alaska	146.9	\$3.41	736,732	\$2,512,256
Arizona	79.6	\$1.85	6,731,484	\$12,453,245
Arkansas	79.8	\$1.85	2,966,369	\$5,487,783
California	106.2	\$2.46	38,802,500	\$95,454,150
Colorado	104.1	\$2.42	5,355,866	\$12,961,196
Connecticut	141.3	\$3.28	3,596,677	\$11,797,101
District of Columbia	100.0	\$2.32	935,614	\$2,170,624
Delaware	128.1	\$2.97	658,893	\$1,956,912
Florida	85.8	\$1.99	19,893,297	\$39,587,661
Georgia	83.8	\$1.94	10,097,343	\$19,588,845
Hawaii	99.4	\$2.31	1,419,561	\$3,279,186
Idaho	73.0	\$1.69	1,634,464	\$2,762,244
Illinois	105.6	\$2.45	12,880,580	\$31,557,421
Indiana	90.3	\$2.09	6,596,855	\$13,787,427
Iowa	98.6	\$2.29	3,107,126	\$7,115,319
Kansas	97.3	\$2.26	2,904,021	\$6,563,087
Kentucky	78.4	\$1.82	4,413,457	\$8,032,492
Louisiana	100.0	\$2.32	4,649,676	\$10,787,248
Maine	79.8	\$1.85	1,330,089	\$2,460,665
Maryland	123.1	\$2.86	5,976,407	\$17,092,524
Massachusetts	126.7	\$2.94	6,745,408	\$19,831,500
Michigan	81.0	\$1.88	9,909,877	\$18,630,569
Minnesota	105.3	\$2.44	5,457,173	\$13,315,502

Mississippi	68.2	\$1.58	2,994,079	\$4,730,645
Missouri	87.4	\$2.03	6,063,589	\$12,309,086
Montana	83.4	\$1.93	1,023,579	\$1,975,507
Nebraska	107.0	\$2.48	1,881,503	\$4,666,127
Nevada	92.9	\$2.16	2,839,099	\$6,132,454
New Hampshire	107.6	\$2.50	1,326,813	\$3,317,033
New Jersey	125.5	\$2.91	8,938,175	\$26,010,089
New Mexico	81.3	\$1.89	2,085,572	\$3,941,731
New York	128.1	\$2.97	19,746,227	\$58,646,294
North Carolina	87.0	\$2.02	9,943,964	\$20,086,807
North Dakota	133.5	\$3.10	739,482	\$2,292,394
Ohio	90.0	\$2.09	11,594,163	\$24,231,801
Oklahoma	87.8	\$2.04	3,878,051	\$7,911,224
Oregon	101.9	\$2.36	3,970,239	\$9,369,764
Pennsylvania	97.0	\$2.25	12,787,209	\$28,771,220
Rhode Island	101.3	\$2.35	1,055,173	\$2,479,657
South Carolina	74.2	\$1.72	4,832,482	\$8,311,869
South Dakota	105.7	\$2.45	853,175	\$2,090,279
Tennessee	82.7	\$1.92	6,549,352	\$12,574,756
Texas	105.6	\$2.45	26,956,958	\$66,044,547
Utah	88.3	\$2.05	2,942,902	\$6,032,949
Vermont	91.9	\$2.13	626,562	\$1,334,577
Virginia	110.5	\$2.56	8,326,289	\$21,315,300
Washington	110.1	\$2.55	7,061,530	\$18,006,902

West Virginia	74.5	\$1.73	1,850,326	\$3,201,064
Wisconsin	92.1	\$2.14	5,757,564	\$12,321,187
Wyoming	144.8	\$3.36	584,153	\$1,962,754
Puerto Rico	100.0	\$2.32	3,548,397	\$8,232,281
American Samoa	100.0	\$2.32	55,519	\$128,804
Guam	100.0	\$2.32	159,358	\$369,711
Northern Mariana Islands	100.0	\$2.32	44,943	\$104,268
Virgin Islands	100.0	\$2.32	106,405	\$246,860

Table B-9 2016 State COA Indicators

State	TTR	State per Capita Indicator	Population	State COA Indicator
Alabama	75.9	\$1.76	4,858,979	\$8,551,803
Alaska	126.8	\$2.94	738,432	\$2,170,990
Arizona	70.7	\$1.64	6,828,065	\$11,198,027
Arkansas	75.9	\$1.76	2,978,204	\$5,241,639
California	104.9	\$2.43	39,144,818	\$95,121,908
Colorado	107.9	\$2.50	5,456,574	\$13,641,435
Connecticut	138.2	\$3.21	3,590,886	\$11,526,744
District of Columbia	100.0	\$2.32	945,934	\$2,194,567
Delaware	115.3	\$2.67	672,228	\$1,794,849
Florida	82.2	\$1.91	20,271,272	\$38,718,130
Georgia	90.7	\$2.10	10,214,860	\$21,451,206
Hawaii	84.8	\$1.97	1,431,603	\$2,820,258
Idaho	70.9	\$1.64	1,654,930	\$2,714,085
Illinois	107.1	\$2.48	12,859,995	\$31,892,788

Indiana	90.7	\$2.10	6,619,680	\$13,901,328
Iowa	98.8	\$2.29	3,123,899	\$7,153,729
Kansas	93.3	\$2.16	2,911,641	\$6,289,145
Kentucky	78.6	\$1.82	4,425,092	\$8,053,667
Louisiana	97.6	\$2.26	4,670,724	\$10,555,836
Maine	77.6	\$1.80	1,329,328	\$2,392,790
Maryland	120.3	\$2.79	6,006,401	\$16,757,859
Massachusetts	133.3	\$3.09	6,794,422	\$20,994,764
Michigan	85.3	\$1.98	9,922,576	\$19,646,700
Minnesota	110.7	\$2.57	5,489,594	\$14,108,257
Mississippi	68.1	\$1.58	2,992,333	\$4,727,886
Missouri	89.6	\$2.08	6,083,672	\$12,654,038
Montana	75.8	\$1.76	1,032,949	\$1,817,990
Nebraska	105.5	\$2.45	1,896,190	\$4,645,666
Nevada	82.3	\$1.91	2,890,845	\$5,521,514
New Hampshire	106.9	\$2.48	1,330,608	\$3,299,908
New Jersey	129.0	\$2.99	8,958,013	\$26,784,459
New Mexico	75.8	\$1.76	2,085,109	\$3,669,792
New York	133.7	\$3.10	19,795,791	\$61,366,952
North Carolina	86.7	\$2.01	10,042,802	\$20,186,032
North Dakota	122.2	\$2.84	756,927	\$2,149,673
Ohio	92.3	\$2.14	11,613,423	\$24,852,725
Oklahoma	85.3	\$1.98	3,911,338	\$7,744,449
Oregon	95.2	\$2.21	4,028,977	\$8,904,039

Pennsylvania	98.1	\$2.28	12,802,503	\$29,189,707
Rhode Island	102.3	\$2.37	1,056,298	\$2,503,426
South Carolina	73.2	\$1.70	4,896,146	\$8,323,448
South Dakota	97.9	\$2.27	858,469	\$1,948,725
Tennessee	82.5	\$1.91	6,600,299	\$12,606,571
Texas	106.7	\$2.48	27,469,114	\$68,123,403
Utah	83.4	\$1.93	2,995,919	\$5,782,124
Vermont	87.1	\$2.02	626,042	\$1,264,605
Virginia	114.6	\$2.66	8,382,993	\$22,298,761
Washington	105.6	\$2.45	7,170,351	\$17,567,360
West Virginia	73.4	\$1.70	1,844,128	\$3,135,018
Wisconsin	95.1	\$2.21	5,771,337	\$12,754,655
Wyoming	128.9	\$2.99	586,107	\$1,752,460
Puerto Rico	100.0	\$2.32	3,474,182	\$8,060,102
American Samoa	100.0	\$2.32	55,519	\$128,804
Guam	100.0	\$2.32	159,358	\$369,711
Northern Mariana Islands	100.0	\$2.32	44,943	\$104,268
Virgin Islands	100.0	\$2.32	106,405	\$246,860

Table B-10 2017 State COA Indicators

State	TTR	State per Capita Indicator	Population	State COA Indicator
Alabama	74.8	\$1.74	4,863,300	\$8,462,142
Alaska	125.0	\$2.90	741,894	\$2,151,493
Arizona	69.4	\$1.61	6,931,071	\$11,159,024
Arkansas	75.1	\$1.74	2,988,248	\$5,199,552

California	106.2	\$2.46	39,250,017	\$96,555,042
Colorado	109.6	\$2.54	5,540,545	\$14,072,984
Connecticut	137.1	\$3.18	3,576,452	\$11,373,117
District of Columbia	100.0	\$2.32	952,065	\$2,208,791
Delaware	118.1	\$2.74	681,170	\$1,866,406
Florida	82.5	\$1.91	20,612,439	\$39,369,758
Georgia	90.6	\$2.10	10,310,371	\$21,651,779
Hawaii	83.8	\$1.94	1,428,557	\$2,771,401
Idaho	70.6	\$1.64	1,683,140	\$2,760,350
Illinois	106.6	\$2.47	12,801,539	\$31,619,801
Indiana	91.3	\$2.12	6,633,053	\$14,062,072
Iowa	97.9	\$2.27	3,134,693	\$7,115,753
Kansas	93.1	\$2.16	2,907,289	\$6,279,744
Kentucky	78.2	\$1.81	4,436,974	\$8,030,923
Louisiana	94.9	\$2.20	4,681,666	\$10,299,665
Maine	76.0	\$1.76	1,331,479	\$2,343,403
Maryland	119.5	\$2.77	6,016,447	\$16,665,558
Massachusetts	134.3	\$3.12	6,811,779	\$21,252,750
Michigan	85.6	\$1.99	9,928,300	\$19,757,317
Minnesota	111.7	\$2.59	5,519,952	\$14,296,676
Mississippi	66.9	\$1.55	2,988,726	\$4,632,525
Missouri	89.2	\$2.07	6,093,000	\$12,612,510
Montana	75.9	\$1.76	1,042,520	\$1,834,835
Nebraska	103.7	\$2.41	1,907,116	\$4,596,150

Nevada	80.7	\$1.87	2,940,058	\$5,497,908
New Hampshire	106.7	\$2.48	1,334,795	\$3,310,292
New Jersey	127.4	\$2.96	8,944,469	\$26,475,628
New Mexico	76.8	\$1.78	2,081,015	\$3,704,207
New York	134.3	\$3.12	19,745,289	\$61,605,302
North Carolina	85.5	\$1.98	10,146,788	\$20,090,640
North Dakota	132.8	\$3.08	757,952	\$2,334,492
Ohio	93.5	\$2.17	11,614,373	\$25,203,189
Oklahoma	88.3	\$2.05	3,923,561	\$8,043,300
Oregon	91.6	\$2.13	4,093,465	\$8,719,080
Pennsylvania	99.6	\$2.31	12,784,227	\$29,531,564
Rhode Island	102.7	\$2.38	1,056,426	\$2,514,294
South Carolina	73.2	\$1.70	4,961,119	\$8,433,902
South Dakota	96.3	\$2.23	865,454	\$1,929,962
Tennessee	82.4	\$1.91	6,651,194	\$12,703,781
Texas	105.3	\$2.44	27,862,596	\$67,984,734
Utah	83.1	\$1.93	3,051,217	\$5,888,849
Vermont	87.4	\$2.03	624,594	\$1,267,926
Virginia	113.2	\$2.63	8,411,808	\$22,123,055
Washington	106.1	\$2.46	7,288,000	\$17,928,480
West Virginia	75.0	\$1.74	1,831,102	\$3,186,117
Wisconsin	95.1	\$2.21	5,778,708	\$12,770,945
Wyoming	123.2	\$2.86	585,501	\$1,674,533
Puerto Rico	100.0	\$2.32	3,411,307	\$7,914,232

American Samoa	100.0	\$2.32	55,519	\$128,804
Guam	100.0	\$2.32	159,358	\$369,711
Northern Mariana Islands	100.0	\$2.32	44,943	\$104,268
Virgin Islands	100.0	\$2.32	106,405	\$246,860

Appendix C: PA Disaster Project Amount Comparison

Table C-1 PA Disaster Project Amount Compared to Minimum Threshold and State COA Indicator (2018\$)

Disaster Number	State Code	FY	Project Amount (2018\$)	Minimum Threshold	Exceed Minimum Threshold (Y/REMOVED)*	State COA Indicator**	Exceed State COA Indicator (Y/REMOVED/N/A)***
1731	CA	2008	\$222,385,962	\$1,535,000	Y	\$89,920,909	Y
1733	OR	2008	\$90,139,491	\$1,535,000	Y	\$8,131,977	Y
1734	WA	2008	\$98,442,672	\$1,535,000	Y	\$15,524,218	Y
1735	OK	2008	\$159,526,698	\$1,535,000	Y	\$6,872,900	Y
1736	MO	2008	\$40,269,319	\$1,535,000	Y	\$12,109,535	Y
1737	IA	2008	\$42,928,827	\$1,535,000	Y	\$6,513,940	Y
1738	NV	2008	\$1,691,581	\$1,535,000	Y	\$6,952,185	REMOVED
1739	NE	2008	\$4,441,724	\$1,535,000	Y	\$3,992,785	Y
1740	IN	2008	\$7,572,802	\$1,535,000	Y	\$13,198,201	REMOVED
1741	KS	2008	\$347,166,621	\$1,535,000	Y	\$6,079,433	Y
1742	MO	2008	\$2,041,622	\$1,535,000	Y	\$12,109,535	REMOVED
1743	HI	2008	\$3,996,407	\$1,535,000	Y	\$3,015,962	Y
1744	AR	2008	\$7,512,972	\$1,535,000	Y	\$4,932,547	Y
1745	TN	2008	\$23,905,160	\$1,535,000	Y	\$12,436,572	Y
1746	KY	2008	\$7,184,046	\$1,535,000	Y	\$7,761,897	REMOVED
1748	MO	2008	\$15,440,283	\$1,535,000	Y	\$12,109,535	Y
1749	MO	2008	\$39,773,474	\$1,535,000	Y	\$12,109,535	Y
1750	GA	2008	\$8,317,702	\$1,535,000	Y	\$20,139,423	REMOVED
1751	AR	2008	\$60,873,156	\$1,535,000	Y	\$4,932,547	Y
1752	OK	2008	\$4,615,629	\$1,535,000	Y	\$6,872,900	REMOVED
1754	OK	2008	\$31,592,532	\$1,535,000	Y	\$6,872,900	Y
1755	ME	2008	\$4,913,559	\$1,535,000	Y	\$2,515,865	Y
1756	OK	2008	\$3,282,995	\$1,535,000	Y	\$6,872,900	REMOVED
1757	KY	2008	\$5,387,922	\$1,535,000	Y	\$7,761,897	REMOVED
1758	AR	2008	\$4,102,729	\$1,535,000	Y	\$4,932,547	REMOVED
1759	SD	2008	\$12,007,156	\$1,535,000	Y	\$1,783,519	Y
1761	GA	2008	\$16,846,492	\$1,535,000	Y	\$20,139,423	REMOVED
1763	IA	2008	\$1,474,011,638	\$1,535,000	Y	\$6,513,940	Y
1764	MS	2008	\$6,245,187	\$1,535,000	Y	\$4,553,305	Y
1765	NE	2008	\$763,529	\$1,535,000	REMOVED	\$3,992,785	N/A
1766	IN	2008	\$151,270,235	\$1,535,000	Y	\$13,198,201	Y
1767	MT	2008	\$5,216,931	\$1,535,000	Y	\$1,752,886	Y
1768	WI	2008	\$72,095,562	\$1,535,000	Y	\$12,155,559	Y
1769	WV	2008	\$6,099,988	\$1,535,000	Y	\$3,007,978	Y
1770	NE	2008	\$55,582,589	\$1,535,000	Y	\$3,992,785	Y
1771	IL	2008	\$78,794,504	\$1,535,000	Y	\$30,846,115	Y
1772	MN	2008	\$9,707,282	\$1,535,000	Y	\$12,786,148	REMOVED
1773	MO	2008	\$41,154,487	\$1,535,000	Y	\$12,109,535	Y
1774	SD	2008	\$7,243,113	\$1,535,000	Y	\$1,783,519	Y
1775	OK	2008	\$14,672,601	\$1,535,000	Y	\$6,872,900	Y

1776	KS	2008	\$84,458,864	\$1,535,000	Y	\$6,079,433	Y
1777	MI	2008	\$22,283,072	\$1,535,000	Y	\$20,042,926	Y
1778	VT	2008	\$1,665,701	\$1,535,000	Y	\$1,310,846	Y
1779	NE	2008	\$18,493,157	\$1,535,000	Y	\$3,992,785	Y
1780	TX	2008	\$104,673,180	\$1,535,000	Y	\$54,741,030	Y
1781	ID	2008	\$2,516,742	\$1,535,000	Y	\$2,773,894	REMOVED
1782	NH	2008	\$1,947,634	\$1,535,000	Y	\$3,302,728	REMOVED
1783	NM	2008	\$59,458,752	\$1,535,000	Y	\$3,900,432	Y
1784	VT	2008	\$692,012	\$1,535,000	REMOVED	\$1,310,846	N/A
1785	FL	2008	\$151,955,832	\$1,535,000	Y	\$42,525,396	Y
1786	LA	2008	\$908,423,630	\$1,535,000	Y	\$9,015,728	Y
1787	NH	2008	\$5,701,648	\$1,535,000	Y	\$3,302,728	Y
1788	ME	2008	\$4,092,275	\$1,535,000	Y	\$2,515,865	Y
1789	AL	2008	\$22,288,592	\$1,535,000	Y	\$8,515,246	Y
1790	VT	2008	\$6,999,168	\$1,535,000	Y	\$1,310,846	Y
1791	TX	2008	\$2,832,313,219	\$1,535,000	Y	\$54,741,030	Y
1792	LA	2008	\$291,872,186	\$1,535,000	Y	\$9,015,728	Y
1793	AR	2008	\$6,148,779	\$1,535,000	Y	\$4,932,547	Y
1794	MS	2008	\$37,556,942	\$1,535,000	Y	\$4,553,305	Y
1795	IN	2008	\$39,419,842	\$1,535,000	Y	\$13,198,201	Y
1796	AK	2008	\$18,525,963	\$1,535,000	Y	\$2,091,443	Y
1798	PR	2009	\$42,888,979	\$1,535,000	Y	\$9,173,366	Y
1797	AL	2008	\$11,012,088	\$1,535,000	Y	\$8,515,246	Y
1799	NH	2009	\$1,275,540	\$1,535,000	REMOVED	\$3,250,048	N/A
1800	IL	2009	\$43,016,978	\$1,535,000	Y	\$31,092,767	Y
1801	NC	2009	\$9,651,484	\$1,535,000	Y	\$20,104,863	REMOVED
1802	KY	2009	\$29,198,173	\$1,535,000	Y	\$7,727,333	Y
1803	OK	2009	\$9,444,588	\$1,535,000	Y	\$7,029,757	Y
1804	AR	2009	\$3,900,532	\$1,535,000	Y	\$4,882,717	REMOVED
1805	OH	2009	\$59,806,878	\$1,535,000	Y	\$23,316,397	Y
1806	FL	2009	\$18,986,153	\$1,535,000	Y	\$42,705,032	REMOVED
1807	VI	2009	\$11,499,542	\$1,535,000	Y	\$1,535,000	Y
1808	KS	2009	\$5,120,368	\$1,535,000	Y	\$6,108,652	REMOVED
1809	MO	2009	\$13,070,938	\$1,535,000	Y	\$11,764,094	Y
1810	CA	2009	\$89,174,430	\$1,535,000	Y	\$91,891,665	REMOVED
1811	SD	2009	\$8,933,295	\$1,535,000	Y	\$1,785,311	Y
1812	NH	2009	\$23,241,487	\$1,535,000	Y	\$3,250,048	Y
1813	MA	2009	\$80,815,771	\$1,535,000	Y	\$18,129,328	Y
1814	HI	2009	\$1,688,696	\$1,535,000	Y	\$3,040,147	REMOVED
1815	ME	2009	\$15,221,743	\$1,535,000	Y	\$2,488,102	Y
1816	VT	2009	\$2,080,954	\$1,535,000	Y	\$1,304,667	Y
1817	WA	2009	\$80,888,761	\$1,535,000	Y	\$15,914,614	Y
1818	KY	2009	\$398,099,605	\$1,535,000	Y	\$7,727,333	Y
1819	AR	2009	\$357,687,370	\$1,535,000	Y	\$4,882,717	Y
1820	OK	2009	\$1,126,824	\$1,535,000	REMOVED	\$7,029,757	N/A
1821	TN	2009	\$9,562,618	\$1,535,000	Y	\$12,305,478	REMOVED
1822	MO	2009	\$211,689,542	\$1,535,000	Y	\$11,764,094	Y
1823	OK	2009	\$14,274,053	\$1,535,000	Y	\$7,029,757	Y

1824	OR	2009	\$16,970,217	\$1,535,000	Y	\$8,262,331	Y
1825	WA	2009	\$41,236,264	\$1,535,000	Y	\$15,914,614	Y
1826	IL	2009	\$18,741,909	\$1,535,000	Y	\$31,092,767	REMOVED
1827	NY	2009	\$28,823,864	\$1,535,000	Y	\$55,157,541	REMOVED
1828	IN	2009	\$17,765,645	\$1,535,000	Y	\$12,689,816	Y
1829	ND	2009	\$150,228,603	\$1,535,000	Y	\$1,347,110	Y
1830	MN	2009	\$46,617,554	\$1,535,000	Y	\$12,685,555	Y
1831	FL	2009	\$48,190,699	\$1,535,000	Y	\$42,705,032	Y
1833	GA	2009	\$32,996,368	\$1,535,000	Y	\$20,049,490	Y
1834	AR	2009	\$7,334,183	\$1,535,000	Y	\$4,882,717	Y
1835	AL	2009	\$28,215,073	\$1,535,000	Y	\$8,484,658	Y
1836	AL	2009	\$9,723,578	\$1,535,000	Y	\$8,484,658	Y
1837	MS	2009	\$4,205,801	\$1,535,000	Y	\$4,643,016	REMOVED
1838	WV	2009	\$26,957,773	\$1,535,000	Y	\$3,012,017	Y
1839	TN	2009	\$7,059,352	\$1,535,000	Y	\$12,305,478	REMOVED
1840	FL	2009	\$9,019,259	\$1,535,000	Y	\$42,705,032	REMOVED
1841	KY	2009	\$41,194,520	\$1,535,000	Y	\$7,727,333	Y
1842	AL	2009	\$6,344,432	\$1,535,000	Y	\$8,484,658	REMOVED
1843	AK	2009	\$30,323,110	\$1,535,000	Y	\$2,120,645	Y
1844	SD	2009	\$8,402,752	\$1,535,000	Y	\$1,785,311	Y
1845	AR	2009	\$14,110,747	\$1,535,000	Y	\$4,882,717	Y
1847	MO	2009	\$42,004,478	\$1,535,000	Y	\$11,764,094	Y
1848	KS	2009	\$19,470,053	\$1,535,000	Y	\$6,108,652	Y
1849	KS	2009	\$18,293,402	\$1,535,000	Y	\$6,108,652	Y
1850	IL	2009	\$24,484,687	\$1,535,000	Y	\$31,092,767	REMOVED
1851	TN	2009	\$13,979,328	\$1,535,000	Y	\$12,305,478	Y
1852	ME	2009	\$4,539,829	\$1,535,000	Y	\$2,488,102	Y
1853	NE	2009	\$6,983,498	\$1,535,000	Y	\$3,941,385	Y
1854	IA	2009	\$10,142,599	\$1,535,000	Y	\$6,395,442	Y
1855	KY	2009	\$9,390,629	\$1,535,000	Y	\$7,727,333	Y
1856	TN	2009	\$3,414,605	\$1,535,000	Y	\$12,305,478	REMOVED
1857	NY	2009	\$73,215,954	\$1,535,000	Y	\$55,157,541	Y
1858	GA	2009	\$130,223,668	\$1,535,000	Y	\$20,049,490	Y
1859	AS	2009	\$118,938,391	\$1,535,000	Y	\$1,535,000	Y
1860	KS	2009	\$5,157,154	\$1,535,000	Y	\$6,108,652	REMOVED
1861	AR	2010	\$24,026,292	\$1,535,000	Y	\$4,969,854	Y
1862	VA	2010	\$12,144,169	\$1,535,000	Y	\$20,494,734	REMOVED
1863	LA	2010	\$9,759,704	\$1,535,000	Y	\$10,107,171	REMOVED
1864	NE	2010	\$7,978,299	\$1,535,000	Y	\$4,096,291	Y
1865	AK	2010	\$6,242,385	\$1,535,000	Y	\$2,137,327	Y
1866	AL	2010	\$6,857,184	\$1,535,000	Y	\$8,522,761	REMOVED
1867	NJ	2010	\$18,861,158	\$1,535,000	Y	\$25,600,753	REMOVED
1868	KS	2010	\$31,129,756	\$1,535,000	Y	\$6,201,243	Y
1869	NY	2010	\$42,388,970	\$1,535,000	Y	\$57,061,043	REMOVED
1870	AL	2010	\$31,811,560	\$1,535,000	Y	\$8,522,761	Y
1871	NC	2010	\$28,935,108	\$1,535,000	Y	\$19,887,474	Y
1872	AR	2010	\$14,328,885	\$1,535,000	Y	\$4,969,854	Y
1873	NJ	2010	\$21,158,263	\$1,535,000	Y	\$25,600,753	REMOVED

1874	VA	2010	\$36,206,786	\$1,535,000	Y	\$20,494,734	Y
1875	MD	2010	\$38,035,507	\$1,535,000	Y	\$15,331,596	Y
1876	OK	2010	\$27,744,585	\$1,535,000	Y	\$7,189,748	Y
1877	IA	2010	\$9,163,856	\$1,535,000	Y	\$6,527,048	Y
1878	NE	2010	\$10,927,306	\$1,535,000	Y	\$4,096,291	Y
1879	ND	2010	\$19,634,849	\$1,535,000	Y	\$1,429,525	Y
1880	IA	2010	\$129,611,599	\$1,535,000	Y	\$6,527,048	Y
1881	WV	2010	\$4,504,649	\$1,535,000	Y	\$3,020,830	Y
1882	DC	2010	\$5,452,503	\$1,535,000	Y	\$2,053,483	Y
1883	OK	2010	\$182,502,328	\$1,535,000	Y	\$7,189,748	Y
1884	CA	2010	\$43,900,636	\$1,535,000	Y	\$92,034,543	REMOVED
1885	KS	2010	\$26,328,797	\$1,535,000	Y	\$6,201,243	Y
1886	SD	2010	\$1,341,811	\$1,535,000	REMOVED	\$1,876,605	N/A
1887	SD	2010	\$75,470,932	\$1,535,000	Y	\$1,876,605	Y
1888	AZ	2010	\$10,849,014	\$1,535,000	Y	\$12,993,683	REMOVED
1889	NJ	2010	\$21,607,447	\$1,535,000	Y	\$25,600,753	REMOVED
1890	DC	2010	\$11,763,556	\$1,535,000	Y	\$2,053,483	Y
1891	ME	2010	\$8,199,689	\$1,535,000	Y	\$2,491,589	Y
1892	NH	2010	\$10,536,355	\$1,535,000	Y	\$3,284,946	Y
1893	WV	2010	\$9,152,396	\$1,535,000	Y	\$3,020,830	Y
1894	RI	2010	\$32,846,378	\$1,535,000	Y	\$2,548,766	Y
1895	MA	2010	\$41,971,175	\$1,535,000	Y	\$18,593,915	Y
1896	DE	2010	\$14,333,840	\$1,535,000	Y	\$2,140,775	Y
1897	NJ	2010	\$48,498,924	\$1,535,000	Y	\$25,600,753	Y
1898	PA	2010	\$69,621,269	\$1,535,000	Y	\$27,730,487	Y
1899	NY	2010	\$135,180,525	\$1,535,000	Y	\$57,061,043	Y
1900	MN	2010	\$20,732,815	\$1,535,000	Y	\$12,796,900	Y
1901	ND	2010	\$41,622,300	\$1,535,000	Y	\$1,429,525	Y
1902	NE	2010	\$4,851,949	\$1,535,000	Y	\$4,096,291	Y
1903	WV	2010	\$5,202,143	\$1,535,000	Y	\$3,020,830	Y
1904	CT	2010	\$14,561,926	\$1,535,000	Y	\$11,962,179	Y
1905	VA	2010	\$46,174,746	\$1,535,000	Y	\$20,494,734	Y
1906	MS	2010	\$7,222,830	\$1,535,000	Y	\$4,575,594	Y
1907	ND	2010	\$30,245,157	\$1,535,000	Y	\$1,429,525	Y
1908	AL	2010	\$11,495,205	\$1,535,000	Y	\$8,522,761	Y
1909	TN	2010	\$319,494,578	\$1,535,000	Y	\$12,340,658	Y
1910	MD	2010	\$92,645,199	\$1,535,000	Y	\$15,331,596	Y
1911	CA	2010	\$39,845,116	\$1,535,000	Y	\$92,034,543	REMOVED
1912	KY	2010	\$29,341,846	\$1,535,000	Y	\$7,765,403	Y
1913	NH	2010	\$3,832,668	\$1,535,000	Y	\$3,284,946	Y
1914	SD	2010	\$2,866,449	\$1,535,000	Y	\$1,876,605	Y
1915	SD	2010	\$33,127,814	\$1,535,000	Y	\$1,876,605	Y
1916	MS	2010	\$9,323,159	\$1,535,000	Y	\$4,575,594	Y
1917	OK	2010	\$9,846,965	\$1,535,000	Y	\$7,189,748	Y
1918	WV	2010	\$8,735,458	\$1,535,000	Y	\$3,020,830	Y
1919	PR	2010	\$7,208,376	\$1,535,000	Y	\$9,204,108	REMOVED
1920	ME	2010	\$1,940,381	\$1,535,000	Y	\$2,491,589	REMOVED
1921	MN	2010	\$20,272,879	\$1,535,000	Y	\$12,796,900	Y

1922	MT	2010	\$14,882,252	\$1,535,000	Y	\$1,852,479	Y
1923	WY	2010	\$4,614,782	\$1,535,000	Y	\$1,817,862	Y
1924	NE	2010	\$81,197,517	\$1,535,000	Y	\$4,096,291	Y
1925	KY	2010	\$9,196,113	\$1,535,000	Y	\$7,765,403	Y
1926	OK	2010	\$5,224,835	\$1,535,000	Y	\$7,189,748	REMOVED
1927	ID	2010	\$3,855,734	\$1,535,000	Y	\$2,859,732	Y
1928	IA	2010	\$4,666,757	\$1,535,000	Y	\$6,527,048	REMOVED
1929	SD	2010	\$1,024,366	\$1,535,000	REMOVED	\$1,876,605	N/A
1930	IA	2010	\$82,295,270	\$1,535,000	Y	\$6,527,048	Y
1931	TX	2010	\$30,226,237	\$1,535,000	Y	\$57,247,118	REMOVED
1932	KS	2010	\$12,029,590	\$1,535,000	Y	\$6,201,243	Y
1933	WI	2010	\$18,852,432	\$1,535,000	Y	\$12,044,669	Y
1934	MO	2010	\$27,432,574	\$1,535,000	Y	\$11,915,284	Y
1935	IL	2010	\$7,707,516	\$1,535,000	Y	\$31,630,502	REMOVED
1936	NM	2010	\$12,459,958	\$1,535,000	Y	\$3,818,375	Y
1937	TN	2010	\$6,103,517	\$1,535,000	Y	\$12,340,658	REMOVED
1938	SD	2010	\$6,822,561	\$1,535,000	Y	\$1,876,605	Y
1939	VI	2010	\$4,761,489	\$1,535,000	Y	\$1,535,000	Y
1940	AZ	2011	\$9,911,589	\$1,535,000	Y	\$12,592,273	REMOVED
1941	MN	2011	\$44,319,744	\$1,535,000	Y	\$12,888,538	Y
1943	NY	2011	\$34,104,417	\$1,535,000	Y	\$56,584,058	REMOVED
1944	WI	2011	\$6,299,233	\$1,535,000	Y	\$12,113,280	REMOVED
1945	NE	2011	\$3,299,401	\$1,535,000	Y	\$4,164,057	REMOVED
1946	PR	2011	\$36,410,583	\$1,535,000	Y	\$8,643,830	Y
1947	SD	2011	\$1,658,004	\$1,535,000	Y	\$1,880,756	REMOVED
1948	VI	2011	\$1,560,542	\$1,535,000	Y	\$1,535,000	Y
1949	VI	2011	\$2,968,559	\$1,535,000	Y	\$1,535,000	Y
1950	AZ	2011	\$737,315	\$1,535,000	REMOVED	\$12,592,273	N/A
1951	VT	2011	\$2,383,871	\$1,535,000	Y	\$1,332,828	Y
1952	CA	2011	\$116,852,470	\$1,535,000	Y	\$92,762,350	Y
1953	ME	2011	\$2,373,830	\$1,535,000	Y	\$2,510,602	REMOVED
1954	NJ	2011	\$76,697,143	\$1,535,000	Y	\$25,848,168	Y
1955	UT	2011	\$12,836,107	\$1,535,000	Y	\$5,334,298	Y
1956	OR	2011	\$6,158,746	\$1,535,000	Y	\$8,351,741	REMOVED
1957	NY	2011	\$65,697,629	\$1,535,000	Y	\$56,584,058	Y
1958	CT	2011	\$20,438,738	\$1,535,000	Y	\$12,151,930	Y
1959	MA	2011	\$38,469,578	\$1,535,000	Y	\$18,464,314	Y
1960	IL	2011	\$71,430,844	\$1,535,000	Y	\$31,435,048	Y
1961	MO	2011	\$14,518,923	\$1,535,000	Y	\$11,917,965	Y
1962	NM	2011	\$2,658,026	\$1,535,000	Y	\$3,912,440	REMOVED
1963	WA	2011	\$11,064,216	\$1,535,000	Y	\$16,744,105	REMOVED
1964	OR	2011	\$8,258,968	\$1,535,000	Y	\$8,351,741	REMOVED
1965	TN	2011	\$8,305,989	\$1,535,000	Y	\$12,438,366	REMOVED
1966	WI	2011	\$12,134,351	\$1,535,000	Y	\$12,113,280	Y
1967	HI	2011	\$9,386,886	\$1,535,000	Y	\$3,251,119	Y
1968	CA	2011	\$56,278,444	\$1,535,000	Y	\$92,762,350	REMOVED
1969	NC	2011	\$28,214,533	\$1,535,000	Y	\$20,215,224	Y
1970	OK	2011	\$7,240,928	\$1,535,000	Y	\$7,315,134	REMOVED

1971	AL	2011	\$260,170,949	\$1,535,000	Y	\$8,651,322	Y
1972	MS	2011	\$35,645,770	\$1,535,000	Y	\$4,599,310	Y
1973	GA	2011	\$30,175,326	\$1,535,000	Y	\$19,665,936	Y
1974	TN	2011	\$76,782,366	\$1,535,000	Y	\$12,438,366	Y
1975	AR	2011	\$74,557,212	\$1,535,000	Y	\$5,015,379	Y
1976	KY	2011	\$48,991,093	\$1,535,000	Y	\$7,810,861	Y
1977	IA	2011	\$4,019,751	\$1,535,000	Y	\$6,610,590	REMOVED
1978	TN	2011	\$10,434,808	\$1,535,000	Y	\$12,438,366	REMOVED
1979	TN	2011	\$28,345,477	\$1,535,000	Y	\$12,438,366	Y
1980	MO	2011	\$258,361,183	\$1,535,000	Y	\$11,917,965	Y
1981	ND	2011	\$280,394,144	\$1,535,000	Y	\$1,486,426	Y
1982	MN	2011	\$30,046,541	\$1,535,000	Y	\$12,888,538	Y
1983	MS	2011	\$11,457,000	\$1,535,000	Y	\$4,599,310	Y
1984	SD	2011	\$77,103,149	\$1,535,000	Y	\$1,880,756	Y
1985	OK	2011	\$5,142,691	\$1,535,000	Y	\$7,315,134	REMOVED
1986	ND	2011	\$8,799,295	\$1,535,000	Y	\$1,486,426	Y
1987	ID	2011	\$4,767,331	\$1,535,000	Y	\$2,900,027	Y
1988	OK	2011	\$5,787,121	\$1,535,000	Y	\$7,315,134	REMOVED
1989	OK	2011	\$10,704,037	\$1,535,000	Y	\$7,315,134	Y
1990	MN	2011	\$5,213,541	\$1,535,000	Y	\$12,888,538	REMOVED
1991	IL	2011	\$20,884,902	\$1,535,000	Y	\$31,435,048	REMOVED
1992	AK	2011	\$2,582,627	\$1,535,000	Y	\$2,173,307	Y
1993	NY	2011	\$51,445,160	\$1,535,000	Y	\$56,584,058	REMOVED
1994	MA	2011	\$112,864,366	\$1,535,000	Y	\$18,464,314	Y
1995	VT	2011	\$20,673,600	\$1,535,000	Y	\$1,332,828	Y
1996	MT	2011	\$63,038,057	\$1,535,000	Y	\$1,879,889	Y
1997	IN	2011	\$21,215,095	\$1,535,000	Y	\$12,902,766	Y
1998	IA	2011	\$73,013,750	\$1,535,000	Y	\$6,610,590	Y
1999	TX	2011	\$78,166,770	\$1,535,000	Y	\$58,086,246	Y
4000	AR	2011	\$4,000,094	\$1,535,000	Y	\$5,015,379	REMOVED
4001	VT	2011	\$16,172,538	\$1,535,000	Y	\$1,332,828	Y
4002	OH	2011	\$52,147,852	\$1,535,000	Y	\$23,073,008	Y
4003	PA	2011	\$16,075,738	\$1,535,000	Y	\$27,945,234	REMOVED
4004	PR	2011	\$11,495,888	\$1,535,000	Y	\$8,643,830	Y
4005	TN	2011	\$10,454,849	\$1,535,000	Y	\$12,438,366	REMOVED
4006	NH	2011	\$1,807,348	\$1,535,000	Y	\$3,264,846	REMOVED
4007	WY	2011	\$8,195,273	\$1,535,000	Y	\$1,882,511	Y
4008	KY	2011	\$3,752,623	\$1,535,000	Y	\$7,810,861	REMOVED
4009	MN	2011	\$16,358,451	\$1,535,000	Y	\$12,888,538	Y
4010	KS	2011	\$10,863,629	\$1,535,000	Y	\$6,276,860	Y
4011	UT	2011	\$11,656,575	\$1,535,000	Y	\$5,334,298	Y
4012	MO	2011	\$32,301,285	\$1,535,000	Y	\$11,917,965	Y
4013	NE	2011	\$101,647,790	\$1,535,000	Y	\$4,164,057	Y
4014	NE	2011	\$5,275,401	\$1,535,000	Y	\$4,164,057	Y
4015	LA	2011	\$9,610,199	\$1,535,000	Y	\$10,200,087	REMOVED
4016	IA	2011	\$8,804,780	\$1,535,000	Y	\$6,610,590	Y
4017	PR	2011	\$89,492,602	\$1,535,000	Y	\$8,643,830	Y
4018	IA	2011	\$6,312,927	\$1,535,000	Y	\$6,610,590	REMOVED

4019	NC	2011	\$131,406,837	\$1,535,000	Y	\$20,215,224	Y
4020	NY	2011	\$1,016,076,866	\$1,535,000	Y	\$56,584,058	Y
4021	NJ	2011	\$180,496,784	\$1,535,000	Y	\$25,848,168	Y
4022	VT	2011	\$256,573,185	\$1,535,000	Y	\$1,332,828	Y
4023	CT	2011	\$63,386,801	\$1,535,000	Y	\$12,151,930	Y
4024	VA	2011	\$86,025,228	\$1,535,000	Y	\$20,802,662	Y
4025	PA	2011	\$38,119,827	\$1,535,000	Y	\$27,945,234	Y
4026	NH	2011	\$26,803,741	\$1,535,000	Y	\$3,264,846	Y
4027	RI	2011	\$12,399,716	\$1,535,000	Y	\$2,547,212	Y
4028	MA	2011	\$44,984,339	\$1,535,000	Y	\$18,464,314	Y
4029	TX	2011	\$73,458,654	\$1,535,000	Y	\$58,086,246	Y
4030	PA	2011	\$226,263,807	\$1,535,000	Y	\$27,945,234	Y
4031	NY	2011	\$483,813,692	\$1,535,000	Y	\$56,584,058	Y
4032	ME	2011	\$2,961,388	\$1,535,000	Y	\$2,510,602	Y
4033	NJ	2011	\$10,792,370	\$1,535,000	Y	\$25,848,168	REMOVED
4034	MD	2011	\$29,705,447	\$1,535,000	Y	\$15,530,855	Y
4035	KS	2011	\$4,399,921	\$1,535,000	Y	\$6,276,860	REMOVED
4036	DC	2011	\$3,660,762	\$1,535,000	Y	\$2,083,207	Y
4037	DE	2011	\$3,053,860	\$1,535,000	Y	\$2,148,151	Y
4038	MD	2012	\$16,547,040	\$1,535,000	Y	\$16,377,492	Y
4039	NJ	2012	\$5,954,165	\$1,535,000	Y	\$26,110,619	REMOVED
4041	LA	2012	\$8,454,729	\$1,535,000	Y	\$10,293,381	REMOVED
4042	VA	2012	\$64,302,442	\$1,535,000	Y	\$21,860,831	Y
4043	VT	2012	\$1,427,278	\$1,535,000	REMOVED	\$1,315,505	N/A
4044	DC	2012	\$5,541,160	\$1,535,000	Y	\$2,104,553	Y
4045	VA	2012	\$8,028,688	\$1,535,000	Y	\$21,860,831	REMOVED
4046	CT	2012	\$133,153,325	\$1,535,000	Y	\$12,246,025	Y
4047	NM	2012	\$41,492,370	\$1,535,000	Y	\$3,914,581	Y
4048	NJ	2012	\$39,328,315	\$1,535,000	Y	\$26,110,619	Y
4049	NH	2012	\$4,949,334	\$1,535,000	Y	\$3,295,485	Y
4050	AK	2012	\$7,331,991	\$1,535,000	Y	\$2,247,653	Y
4051	MA	2012	\$103,797,386	\$1,535,000	Y	\$18,445,101	Y
4053	UT	2012	\$4,406,223	\$1,535,000	Y	\$5,690,788	REMOVED
4054	AK	2012	\$1,961,876	\$1,535,000	Y	\$2,247,653	REMOVED
4055	OR	2012	\$21,847,364	\$1,535,000	Y	\$8,634,246	Y
4056	WA	2012	\$44,261,016	\$1,535,000	Y	\$17,143,395	Y
4057	KY	2012	\$21,378,701	\$1,535,000	Y	\$8,039,615	Y
4058	IN	2012	\$7,137,661	\$1,535,000	Y	\$13,359,690	REMOVED
4059	WV	2012	\$10,222,962	\$1,535,000	Y	\$3,265,441	Y
4061	WV	2012	\$5,786,874	\$1,535,000	Y	\$3,265,441	Y
4062	HI	2012	\$4,580,231	\$1,535,000	Y	\$3,327,040	Y
4063	KS	2012	\$7,169,139	\$1,535,000	Y	\$6,575,135	Y
4064	OK	2012	\$4,273,378	\$1,535,000	Y	\$7,469,271	REMOVED
4065	NH	2012	\$4,429,828	\$1,535,000	Y	\$3,295,485	Y
4066	VT	2012	\$1,476,503	\$1,535,000	REMOVED	\$1,315,505	N/A
4067	CO	2012	\$5,894,810	\$1,535,000	Y	\$12,945,494	REMOVED
4068	FL	2012	\$74,428,924	\$1,535,000	Y	\$40,783,140	Y
4069	MN	2012	\$62,820,834	\$1,535,000	Y	\$13,041,461	Y

4070	NJ	2012	\$12,780,585	\$1,535,000	Y	\$26,110,619	REMOVED
4071	WV	2012	\$17,088,833	\$1,535,000	Y	\$3,265,441	Y
4072	VA	2012	\$31,455,786	\$1,535,000	Y	\$21,860,831	Y
4073	DC	2012	\$4,250,976	\$1,535,000	Y	\$2,104,553	Y
4074	MT	2012	\$1,891,683	\$1,535,000	Y	\$1,866,632	Y
4075	MD	2012	\$17,544,124	\$1,535,000	Y	\$16,377,492	Y
4076	WI	2012	\$12,439,921	\$1,535,000	Y	\$12,280,299	Y
4077	OH	2012	\$24,107,104	\$1,535,000	Y	\$23,205,352	Y
4079	NM	2012	\$156,903,112	\$1,535,000	Y	\$3,914,581	Y
4080	LA	2012	\$477,919,703	\$1,535,000	Y	\$10,293,381	Y
4081	MS	2012	\$54,325,909	\$1,535,000	Y	\$4,974,115	Y
4082	AL	2012	\$9,609,802	\$1,535,000	Y	\$8,644,932	Y
4083	WA	2012	\$4,148,883	\$1,535,000	Y	\$17,143,395	REMOVED
4084	FL	2013	\$33,380,371	\$1,535,000	Y	\$40,566,893	REMOVED
4085	NY	2013	\$17,504,238,326	\$1,535,000	Y	\$56,753,757	Y
4086	NJ	2013	\$2,485,239,267	\$1,535,000	Y	\$26,061,895	Y
4087	CT	2013	\$86,526,849	\$1,535,000	Y	\$11,955,856	Y
4088	UT	2013	\$2,428,725	\$1,535,000	Y	\$5,881,891	REMOVED
4089	RI	2013	\$12,482,040	\$1,535,000	Y	\$2,552,210	Y
4090	DE	2013	\$9,644,749	\$1,535,000	Y	\$2,219,454	Y
4091	MD	2013	\$49,430,091	\$1,535,000	Y	\$16,476,776	Y
4092	VA	2013	\$15,193,845	\$1,535,000	Y	\$21,938,124	REMOVED
4093	WV	2013	\$21,695,174	\$1,535,000	Y	\$3,209,864	Y
4094	AK	2013	\$34,936,224	\$1,535,000	Y	\$2,267,492	Y
4095	NH	2013	\$3,081,459	\$1,535,000	Y	\$3,394,245	REMOVED
4096	DC	2013	\$4,550,764	\$1,535,000	Y	\$2,127,653	Y
4097	MA	2013	\$16,722,532	\$1,535,000	Y	\$19,140,895	REMOVED
4098	OH	2013	\$35,162,038	\$1,535,000	Y	\$23,088,450	Y
4099	PA	2013	\$18,203,830	\$1,535,000	Y	\$28,335,050	REMOVED
4100	AR	2013	\$12,180,328	\$1,535,000	Y	\$5,249,453	Y
4101	MS	2013	\$9,506,361	\$1,535,000	Y	\$4,895,279	Y
4102	LA	2013	\$8,287,373	\$1,535,000	Y	\$11,274,638	REMOVED
4105	NH	2013	\$8,856,173	\$1,535,000	Y	\$3,394,245	Y
4106	CT	2013	\$45,553,356	\$1,535,000	Y	\$11,955,856	Y
4107	RI	2013	\$11,297,649	\$1,535,000	Y	\$2,552,210	Y
4108	ME	2013	\$4,476,549	\$1,535,000	Y	\$2,565,341	Y
4109	OK	2013	\$83,409,792	\$1,535,000	Y	\$7,515,195	Y
4110	MA	2013	\$95,379,679	\$1,535,000	Y	\$19,140,895	Y
4111	NY	2013	\$34,776,571	\$1,535,000	Y	\$56,753,757	REMOVED
4112	KS	2013	\$1,888,833	\$1,535,000	Y	\$6,579,863	REMOVED
4113	MN	2013	\$19,782,731	\$1,535,000	Y	\$13,394,056	Y
4114	IA	2013	\$22,396,004	\$1,535,000	Y	\$7,070,628	Y
4115	SD	2013	\$11,814,600	\$1,535,000	Y	\$2,000,050	Y
4116	IL	2013	\$44,464,777	\$1,535,000	Y	\$32,059,385	Y
4117	OK	2013	\$76,372,353	\$1,535,000	Y	\$7,515,195	Y
4118	ND	2013	\$10,242,770	\$1,535,000	Y	\$1,812,037	Y
4119	IA	2013	\$10,830,112	\$1,535,000	Y	\$7,070,628	Y
4120	VT	2013	\$2,736,220	\$1,535,000	Y	\$1,302,103	Y

4121	MI	2013	\$7,001,595	\$1,535,000	Y	\$18,185,382	REMOVED
4122	AK	2013	\$44,415,654	\$1,535,000	Y	\$2,267,492	Y
4124	AR	2013	\$12,046,109	\$1,535,000	Y	\$5,249,453	Y
4125	SD	2013	\$1,758,575	\$1,535,000	Y	\$2,000,050	REMOVED
4126	IA	2013	\$29,609,353	\$1,535,000	Y	\$7,070,628	Y
4127	MT	2013	\$4,028,137	\$1,535,000	Y	\$1,889,665	Y
4128	ND	2013	\$14,811,267	\$1,535,000	Y	\$1,812,037	Y
4129	NY	2013	\$91,676,620	\$1,535,000	Y	\$56,753,757	Y
4130	MO	2013	\$12,617,630	\$1,535,000	Y	\$12,345,075	Y
4131	MN	2013	\$19,717,118	\$1,535,000	Y	\$13,394,056	Y
4132	WV	2013	\$4,716,398	\$1,535,000	Y	\$3,209,864	Y
4133	CO	2013	\$247,546	\$1,535,000	REMOVED	\$12,761,452	N/A
4134	CO	2013	\$9,506,190	\$1,535,000	Y	\$12,761,452	REMOVED
4135	IA	2013	\$6,510,210	\$1,535,000	Y	\$7,070,628	REMOVED
4136	TX	2013	\$41,257,692	\$1,535,000	Y	\$60,978,535	REMOVED
4137	SD	2013	\$1,616,163	\$1,535,000	Y	\$2,000,050	REMOVED
4138	FL	2013	\$59,574,324	\$1,535,000	Y	\$40,566,893	Y
4139	NH	2013	\$8,465,768	\$1,535,000	Y	\$3,394,245	Y
4140	VT	2013	\$8,862,822	\$1,535,000	Y	\$1,302,103	Y
4141	WI	2013	\$8,409,938	\$1,535,000	Y	\$12,311,756	REMOVED
4143	AR	2013	\$12,098,342	\$1,535,000	Y	\$5,249,453	Y
4144	MO	2013	\$25,842,753	\$1,535,000	Y	\$12,345,075	Y
4145	CO	2013	\$513,396,603	\$1,535,000	Y	\$12,761,452	Y
4146	NC	2013	\$14,520,604	\$1,535,000	Y	\$20,771,915	REMOVED
4148	NM	2013	\$8,274,983	\$1,535,000	Y	\$3,816,535	Y
4149	PA	2014	\$17,167,370	\$1,535,000	Y	\$28,613,314	REMOVED
4150	KS	2014	\$14,523,920	\$1,535,000	Y	\$6,771,859	Y
4152	NM	2014	\$59,464,464	\$1,535,000	Y	\$3,774,369	Y
4153	NC	2014	\$11,720,379	\$1,535,000	Y	\$20,680,926	REMOVED
4154	ND	2014	\$6,160,770	\$1,535,000	Y	\$1,989,331	Y
4155	SD	2014	\$61,109,361	\$1,535,000	Y	\$2,129,090	Y
4156	NE	2014	\$3,868,478	\$1,535,000	Y	\$4,671,290	REMOVED
4158	CA	2014	\$41,260,881	\$1,535,000	Y	\$91,614,725	REMOVED
4159	TX	2014	\$11,791,768	\$1,535,000	Y	\$63,740,145	REMOVED
4160	AR	2014	\$7,721,969	\$1,535,000	Y	\$5,297,278	Y
4161	AK	2014	\$1,626,857	\$1,535,000	Y	\$2,345,071	REMOVED
4162	AK	2014	\$45,444,006	\$1,535,000	Y	\$2,345,071	Y
4163	VT	2014	\$8,763,921	\$1,535,000	Y	\$1,334,722	Y
4164	OK	2014	\$5,474,035	\$1,535,000	Y	\$7,701,136	REMOVED
4165	GA	2014	\$62,613,089	\$1,535,000	Y	\$19,984,334	Y
4166	SC	2014	\$286,189,686	\$1,535,000	Y	\$8,403,717	Y
4167	NC	2014	\$51,613,796	\$1,535,000	Y	\$20,680,926	Y
4168	WA	2014	\$38,444,889	\$1,535,000	Y	\$17,428,515	Y
4169	OR	2014	\$8,871,617	\$1,535,000	Y	\$9,117,751	REMOVED
4170	MD	2014	\$12,253,336	\$1,535,000	Y	\$16,659,967	REMOVED
4171	TN	2014	\$10,429,728	\$1,535,000	Y	\$12,732,117	REMOVED
4172	MT	2014	\$2,720,258	\$1,535,000	Y	\$1,949,117	Y
4173	IN	2014	\$13,917,243	\$1,535,000	Y	\$13,798,894	Y

4174	AR	2014	\$14,030,151	\$1,535,000	Y	\$5,297,278	Y
4175	MS	2014	\$133,247,719	\$1,535,000	Y	\$4,875,667	Y
4176	AL	2014	\$48,939,718	\$1,535,000	Y	\$8,749,037	Y
4177	FL	2014	\$195,099,863	\$1,535,000	Y	\$40,278,892	Y
4178	VT	2014	\$2,566,955	\$1,535,000	Y	\$1,334,722	Y
4179	NE	2014	\$14,207,020	\$1,535,000	Y	\$4,671,290	Y
4180	NY	2014	\$39,666,445	\$1,535,000	Y	\$57,184,780	REMOVED
4181	IA	2014	\$7,704,015	\$1,535,000	Y	\$7,107,957	Y
4182	MN	2014	\$57,239,115	\$1,535,000	Y	\$13,442,542	Y
4183	NE	2014	\$19,235,887	\$1,535,000	Y	\$4,671,290	Y
4184	IA	2014	\$24,960,270	\$1,535,000	Y	\$7,107,957	Y
4185	NE	2014	\$5,375,904	\$1,535,000	Y	\$4,671,290	Y
4186	SD	2014	\$15,699,640	\$1,535,000	Y	\$2,129,090	Y
4187	IA	2014	\$20,343,688	\$1,535,000	Y	\$7,107,957	Y
4188	WA	2014	\$34,363,976	\$1,535,000	Y	\$17,428,515	Y
4189	TN	2014	\$7,715,538	\$1,535,000	Y	\$12,732,117	REMOVED
4190	ND	2014	\$3,360,525	\$1,535,000	Y	\$1,989,331	Y
4191	GU	2014	\$842,307	\$1,535,000	REMOVED	\$1,535,000	N/A
4192	AS	2014	\$935,905	\$1,535,000	REMOVED	\$1,535,000	N/A
4193	CA	2014	\$41,478,263	\$1,535,000	Y	\$91,614,725	REMOVED
4194	HI	2014	\$8,774,582	\$1,535,000	Y	\$3,341,649	Y
4195	MI	2014	\$20,305,915	\$1,535,000	Y	\$18,405,857	Y
4196	KY	2014	\$7,990,629	\$1,535,000	Y	\$8,131,296	REMOVED
4197	NM	2015	\$8,767,953	\$1,535,000	Y	\$3,941,731	Y
4198	MT	2015	\$2,290,728	\$1,535,000	Y	\$1,975,507	Y
4199	NM	2015	\$119,895,563	\$1,535,000	Y	\$3,941,731	Y
4200	MO	2015	\$7,925,862	\$1,535,000	Y	\$12,309,086	REMOVED
4201	HI	2015	\$15,932,671	\$1,535,000	Y	\$3,279,186	Y
4202	NV	2015	\$3,638,327	\$1,535,000	Y	\$6,132,454	REMOVED
4203	AZ	2015	\$8,358,125	\$1,535,000	Y	\$12,453,245	REMOVED
4204	NY	2015	\$44,865,917	\$1,535,000	Y	\$58,646,294	REMOVED
4205	MS	2015	\$4,039,255	\$1,535,000	Y	\$4,730,645	REMOVED
4207	VT	2015	\$5,457,831	\$1,535,000	Y	\$1,334,577	Y
4208	ME	2015	\$3,721,177	\$1,535,000	Y	\$2,460,665	Y
4209	NH	2015	\$6,921,014	\$1,535,000	Y	\$3,317,033	Y
4210	WV	2015	\$122,233,818	\$1,535,000	Y	\$3,201,064	Y
4211	TN	2015	\$49,046,706	\$1,535,000	Y	\$12,574,756	Y
4212	RI	2015	\$12,424,225	\$1,535,000	Y	\$2,479,657	Y
4213	CT	2015	\$13,442,892	\$1,535,000	Y	\$11,797,101	Y
4214	MA	2015	\$122,633,778	\$1,535,000	Y	\$19,831,500	Y
4215	GA	2015	\$14,820,921	\$1,535,000	Y	\$19,588,845	REMOVED
4216	KY	2015	\$6,215,340	\$1,535,000	Y	\$8,032,492	REMOVED
4217	KY	2015	\$18,490,916	\$1,535,000	Y	\$8,032,492	Y
4218	KY	2015	\$28,984,543	\$1,535,000	Y	\$8,032,492	Y
4219	WV	2015	\$13,153,466	\$1,535,000	Y	\$3,201,064	Y
4220	WV	2015	\$10,402,011	\$1,535,000	Y	\$3,201,064	Y
4221	WV	2015	\$10,621,949	\$1,535,000	Y	\$3,201,064	Y
4222	OK	2015	\$92,330,960	\$1,535,000	Y	\$7,911,224	Y

4223	TX	2015	\$228,309,476	\$1,535,000	Y	\$66,044,547	Y
4224	GU	2015	\$7,253,029	\$1,535,000	Y	\$1,535,000	Y
4225	NE	2015	\$20,364,927	\$1,535,000	Y	\$4,666,127	Y
4226	AR	2015	\$17,186,257	\$1,535,000	Y	\$5,487,783	Y
4227	WY	2015	\$3,568,743	\$1,535,000	Y	\$1,962,754	Y
4228	LA	2015	\$12,935,746	\$1,535,000	Y	\$10,787,248	Y
4229	CO	2015	\$36,079,265	\$1,535,000	Y	\$12,961,196	Y
4230	KS	2015	\$15,623,230	\$1,535,000	Y	\$6,563,087	Y
4231	NJ	2015	\$16,230,842	\$1,535,000	Y	\$26,010,089	REMOVED
4232	VT	2015	\$1,339,031	\$1,535,000	REMOVED	\$1,334,577	N/A
4233	SD	2015	\$4,185,665	\$1,535,000	Y	\$2,090,279	Y
4234	IA	2015	\$10,280,767	\$1,535,000	Y	\$7,115,319	Y
4235	MP	2015	\$46,873,297	\$1,535,000	Y	\$1,535,000	Y
4236	WV	2015	\$12,982,347	\$1,535,000	Y	\$3,201,064	Y
4238	MO	2015	\$71,881,195	\$1,535,000	Y	\$12,309,086	Y
4239	KY	2015	\$14,723,391	\$1,535,000	Y	\$8,032,492	Y
4240	CA	2015	\$333,447,810	\$1,535,000	Y	\$95,454,150	Y
4241	SC	2016	\$182,195,866	\$1,535,000	Y	\$8,323,448	Y
4242	WA	2016	\$8,481,537	\$1,535,000	Y	\$17,567,360	REMOVED
4243	WA	2016	\$29,186,860	\$1,535,000	Y	\$17,567,360	Y
4244	AK	2016	\$5,661,379	\$1,535,000	Y	\$2,170,990	Y
4245	TX	2016	\$61,727,394	\$1,535,000	Y	\$68,123,403	REMOVED
4246	ID	2016	\$3,613,662	\$1,535,000	Y	\$2,714,085	Y
4247	OK	2016	\$39,914,573	\$1,535,000	Y	\$7,744,449	Y
4248	MS	2016	\$7,781,480	\$1,535,000	Y	\$4,727,886	Y
4249	WA	2016	\$34,095,253	\$1,535,000	Y	\$17,567,360	Y
4250	MO	2016	\$51,570,288	\$1,535,000	Y	\$12,654,038	Y
4251	AL	2016	\$53,724,465	\$1,535,000	Y	\$8,551,803	Y
4252	ID	2016	\$15,378,558	\$1,535,000	Y	\$2,714,085	Y
4253	WA	2016	\$14,796,231	\$1,535,000	Y	\$17,567,360	REMOVED
4254	AR	2016	\$17,045,127	\$1,535,000	Y	\$5,241,639	Y
4255	TX	2016	\$37,146,926	\$1,535,000	Y	\$68,123,403	REMOVED
4256	OK	2016	\$67,238,634	\$1,535,000	Y	\$7,744,449	Y
4257	AK	2016	\$15,859,990	\$1,535,000	Y	\$2,170,990	Y
4258	OR	2016	\$40,587,688	\$1,535,000	Y	\$8,904,039	Y
4259	GA	2016	\$28,072,582	\$1,535,000	Y	\$21,451,206	Y
4260	DC	2016	\$24,647,847	\$1,535,000	Y	\$2,194,567	Y
4261	MD	2016	\$98,115,620	\$1,535,000	Y	\$16,757,859	Y
4262	VA	2016	\$65,456,486	\$1,535,000	Y	\$22,298,761	Y
4263	LA	2016	\$112,281,232	\$1,535,000	Y	\$10,555,836	Y
4264	NJ	2016	\$105,263,144	\$1,535,000	Y	\$26,784,459	Y
4265	DE	2016	\$2,255,289	\$1,535,000	Y	\$1,794,849	Y
4266	TX	2016	\$44,620,643	\$1,535,000	Y	\$68,123,403	REMOVED
4267	PA	2016	\$62,675,431	\$1,535,000	Y	\$29,189,707	Y
4268	MS	2016	\$13,847,450	\$1,535,000	Y	\$4,727,886	Y
4269	TX	2016	\$44,361,446	\$1,535,000	Y	\$68,123,403	REMOVED
4270	AR	2016	\$3,500,166	\$1,535,000	Y	\$5,241,639	REMOVED
4271	MT	2016	\$2,357,576	\$1,535,000	Y	\$1,817,990	Y

4272	TX	2016	\$87,607,779	\$1,535,000	Y	\$68,123,403	Y
4273	WV	2016	\$457,163,046	\$1,535,000	Y	\$3,135,018	Y
4274	OK	2016	\$6,393,033	\$1,535,000	Y	\$7,744,449	REMOVED
4275	MT	2016	\$4,554,672	\$1,535,000	Y	\$1,817,990	Y
4276	WI	2016	\$16,087,769	\$1,535,000	Y	\$12,754,655	Y
4277	LA	2016	\$763,745,593	\$1,535,000	Y	\$10,555,836	Y
4278	KY	2016	\$6,513,151	\$1,535,000	Y	\$8,053,667	REMOVED
4279	MD	2016	\$10,206,733	\$1,535,000	Y	\$16,757,859	REMOVED
4280	FL	2016	\$83,002,804	\$1,535,000	Y	\$38,718,130	Y
4281	IA	2016	\$7,912,428	\$1,535,000	Y	\$7,153,729	Y
4282	HI	2017	\$5,676,985	\$1,535,000	Y	\$2,771,401	Y
4283	FL	2017	\$538,512,011	\$1,535,000	Y	\$39,369,758	Y
4284	GA	2017	\$123,304,032	\$1,535,000	Y	\$21,651,779	Y
4285	NC	2017	\$406,151,859	\$1,535,000	Y	\$20,090,640	Y
4286	SC	2017	\$335,390,515	\$1,535,000	Y	\$8,433,902	Y
4287	KS	2017	\$9,336,547	\$1,535,000	Y	\$6,279,744	Y
4288	WI	2017	\$11,978,666	\$1,535,000	Y	\$12,770,945	REMOVED
4289	IA	2017	\$19,293,889	\$1,535,000	Y	\$7,115,753	Y
4290	MN	2017	\$9,736,630	\$1,535,000	Y	\$14,296,676	REMOVED
4291	VA	2017	\$21,592,383	\$1,535,000	Y	\$22,123,055	REMOVED
4292	PA	2017	\$38,692,759	\$1,535,000	Y	\$29,531,564	Y
4293	TN	2017	\$5,464,985	\$1,535,000	Y	\$12,703,781	REMOVED
4294	GA	2017	\$20,441,703	\$1,535,000	Y	\$21,651,779	REMOVED
4295	MS	2017	\$11,533,044	\$1,535,000	Y	\$4,632,525	Y
4296	OR	2017	\$17,844,164	\$1,535,000	Y	\$8,719,080	Y
4297	GA	2017	\$30,586,294	\$1,535,000	Y	\$21,651,779	Y
4298	SD	2017	\$13,083,765	\$1,535,000	Y	\$1,929,962	Y
4299	OK	2017	\$163,803,596	\$1,535,000	Y	\$8,043,300	Y
4301	CA	2017	\$156,163,744	\$1,535,000	Y	\$96,555,042	Y
4303	NV	2017	\$14,882,558	\$1,535,000	Y	\$5,497,908	Y
4304	KS	2017	\$12,029,348	\$1,535,000	Y	\$6,279,744	Y
4305	CA	2017	\$69,134,679	\$1,535,000	Y	\$96,555,042	REMOVED
4306	WY	2017	\$3,332,863	\$1,535,000	Y	\$1,674,533	Y
4307	NV	2017	\$18,870,227	\$1,535,000	Y	\$5,497,908	Y
4308	CA	2017	\$628,044,556	\$1,535,000	Y	\$96,555,042	Y
4309	WA	2017	\$36,406,165	\$1,535,000	Y	\$17,928,480	Y
4310	ID	2017	\$10,002,179	\$1,535,000	Y	\$2,760,350	Y
4311	UT	2017	\$4,524,096	\$1,535,000	Y	\$5,888,849	REMOVED
4313	ID	2017	\$9,184,400	\$1,535,000	Y	\$2,760,350	Y
4314	MS	2017	\$20,858,369	\$1,535,000	Y	\$4,632,525	Y
4315	OK	2017	\$117,592,943	\$1,535,000	Y	\$8,043,300	Y
4316	NH	2017	\$2,298,328	\$1,535,000	Y	\$3,310,292	REMOVED
4317	MO	2017	\$92,086,426	\$1,535,000	Y	\$12,612,510	Y
4318	AR	2017	\$38,346,483	\$1,535,000	Y	\$5,199,552	Y
4319	KS	2017	\$33,344,298	\$1,535,000	Y	\$6,279,744	Y
4320	TN	2017	\$43,656,048	\$1,535,000	Y	\$12,703,781	Y
4321	NE	2017	\$3,723,042	\$1,535,000	Y	\$4,596,150	REMOVED
4322	NY	2017	\$36,855,680	\$1,535,000	Y	\$61,605,302	REMOVED

4323	ND	2017	\$6,946,919	\$1,535,000	Y	\$2,334,492	Y
4324	OK	2017	\$6,013,449	\$1,535,000	Y	\$8,043,300	REMOVED
4325	NE	2017	\$20,619,687	\$1,535,000	Y	\$4,596,150	Y
4327	WY	2017	\$7,170,831	\$1,535,000	Y	\$1,674,533	Y
4328	OR	2017	\$3,973,642	\$1,535,000	Y	\$8,719,080	REMOVED
4329	NH	2017	\$3,844,121	\$1,535,000	Y	\$3,310,292	Y
4330	VT	2017	\$12,725,466	\$1,535,000	Y	\$1,267,926	Y
4331	WV	2017	\$21,179,938	\$1,535,000	Y	\$3,186,117	Y
4332	TX	2017	\$1,607,746,263	\$1,535,000	Y	\$67,984,734	Y
4333	ID	2017	\$3,427,857	\$1,535,000	Y	\$2,760,350	Y
4334	IA	2017	\$8,592,864	\$1,535,000	Y	\$7,115,753	Y
4335	VI	2017	\$70,936,993	\$1,535,000	Y	\$1,535,000	Y
4336	PR	2017	\$15,790,164	\$1,535,000	Y	\$7,914,232	Y
4337	FL	2017	\$1,131,955,309	\$1,535,000	Y	\$39,369,758	Y
4338	GA	2017	\$157,222,748	\$1,535,000	Y	\$21,651,779	Y
4339	PR	2017	\$7,487,086,849	\$1,535,000	Y	\$7,914,232	Y
4340	VI	2017	\$2,162,048,128	\$1,535,000	Y	\$1,535,000	Y

*Disasters with project amounts (2018\$) higher than the minimum threshold were marked as Y. Disaster with project amounts below the minimum threshold were marked as REMOVED.

**AS, GU, MP, VI, and VT had State COA indicators that were below the minimum threshold. For these territories and State, FEMA used a value of \$1,535,000 in the State COA Indicator column.

***Disasters with project amounts below the minimum threshold were marked as N/A, as these were already removed. Disasters with project amounts higher than the State COA indicator were designated as Y. Disasters with project amounts less than the State COA indicator but higher than the minimum threshold were marked as REMOVED.